STATION AVENUE PROJECT

Central Rohnert Park Priority Development Area Plan
EIR Consistency Review

City of Rohnert Park

Development Services
130 Avram Avenue
Rohnert Park, CA 94928-2486

OCTOBER 2018

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I. Introduction and Overview

Central Rohnert Park Priority Development Area Plan

The Station Avenue Project (proposed project, previously called Rohnert Station) is within the Central Rohnert Park, Priority Development Area (PDA) Plan area. The City of Rohnert Park (City) approved the PDA Plan in March 2016. The intent of the PDA Plan is to support transit-oriented and infill development in existing communities within the City, particularly adjacent to transit. The triangular-shaped 330-acre Plan area is bounded on the west by U.S. 101, on the east by the SMART rail line, and on the south by Avram Avenue/Santa Alicia Drive. The Plan area is envisioned as a central business district, urban neighborhood, and new downtown area for the city with new mixed-use infill areas, redevelopment of vacant buildings and sites, and streetscape and other public-realm improvements.

The PDA Plan includes various development types: multifamily residential units; retail/service commercial, public institutional, office, and light industrial uses; public park facilities; and open space. The PDA Plan includes modifications to existing roadways; new roadways at certain key sites to provide greater connectivity; improvements to transit, bicycle, and pedestrian facilities; and corresponding circulation connections. The aim of the PDA Plan is to improve non-vehicular access in the area, connect to and complete regional trails, and support the development of existing and new mixed-use areas in the community, with a particular focus on providing community access to the SMART rail station and multi-use path.

Central Rohnert Park Priority Development Area Plan Environmental Impact Report (EIR)

In accordance with the California Environmental Quality Act (CEQA), the City prepared an EIR to analyze the impacts associated with implementation of the PDA Plan on a program-level basis (PDA EIR). The PDA EIR (SCH no. 2015102081) was certified in March 2016.

In the PDA EIR, impacts associated with the PDA Plan were analyzed from the viewpoint of the following 17 environmental resource areas:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Transportation and Traffic
- Utilities and Service Systems
- Growth-Inducing Impacts

The City determined that the PDA Plan would not have the potential to cause significant impacts associated with the following issue areas. These issue areas were addressed briefly in Chapter 5.0 "Effects Found Not to Be Significant" of the PDA EIR:

- Aesthetics
- Agriculture and Forestry Resources
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Utilities and Service Systems

Analyses for the remaining resource topics are provided in Chapters 3.1 through 3.9 of the PDA EIR, with CEQA considerations included in Chapter 4.0 of the PDA EIR.

Based on the environmental analyses included in the PDA EIR, the City determined that the PDA Plan, in conjunction with cumulative development within the City of Rohnert Park, would result in a significant and unavoidable impact associated with transportation and traffic as it relates to the level of service along U.S. Highway 101. All other environmental impacts were determined to be less than significant or less than significant with implementation of applicable mitigation measures. In compliance with CEQA and to ensure the effective implementation and enforcement of adopted mitigation measures, the City adopted a Mitigation Monitoring and Reporting Program (MMRP) for the PDA EIR. The MMRP was adopted concurrently with the PDA EIR and is included as Appendix H.

Station Avenue Project

The Station Avenue Project is located within the PDA, therefore this analysis has been prepared to evaluate the consistency of the proposed project with the PDA EIR. An overview of the proposed project is presented below. Section II of this document discusses the environmental impacts included in the PDA EIR, by resource topic, followed by a brief analysis of the proposed project's environmental effects related to the PDA EIR impact conclusions and applicability of PDA EIR mitigation measures. Project-specific studies were prepared for the proposed project to determine if the project would result in any significant environmental impacts that were not identified in the PDA EIR. For a list of the technical studies prepared for the proposed project, refer to Section IV References and the Appendices. The Section II consistency analysis provides a brief discussion of the resource topics addressed in Chapter 5.0 "Effects Found Not to Be Significant" of the PDA EIR demonstrating that the conclusions in Chapter 5.0 of the PDA EIR are applicable to the proposed project.

Project Location and Existing and Adjacent Uses

The approximately 32-acre project site includes two parcels located at 6400 State Farm Drive and 600 Enterprise Drive (Assessor's Parcel Numbers (APNs) 143-051-072 and 143-051-089). The project site is developed with an unoccupied 288,230 square foot (sf) former State Farm Insurance office building, surface parking lots and on-site driveways, the City's 7,170 sf Corporation Yard building, and an undeveloped area of grass and mature trees located in the northern portion of the site. In addition, there are numerous trees and other landscaping present throughout the site.

The project site is bounded by Rohnert Park Expressway to the north; Enterprise Drive to the south; the Rohnert Park SMART Station and parking lot to the to the east; and State Farm Drive to the west.

Station Avenue Project Description and Land Uses

Summary of the PDA Plan

The project site is designated as the Station Center subarea of the PDA. The total development potential evaluated in the PDA EIR for the Station Center subarea included 415 residential units, 171,626 sf in retail/commercial, 65,340 sf in office, and 6 acres in parks/open space for a total of 236,966 sf of non-residential uses. However, for the purposes of the traffic analysis prepared for the PDA Plan EIR, a total of 565 residential units were evaluated and 171,630 sf of retail/commercial uses, in addition to 65,340 sf

in office and 6 acres in parks/open space. The traffic analysis also notes that a hotel use was accounted for in the land use assumptions factored into the traffic model. The PDA Plan also includes signalization of the intersection at State Farm Drive/City Center Drive and installation of a pedestrian hybrid beacon at the Rohnert Park Expressway/Lynne Conde Way-Quest Street intersection.

The PDA EIR also assumed the addition of a new loop route and three new transit stops and bus pullout areas, including a potential bus transfer station stop adjacent to the SMART rail station platform, located adjacent to the eastern boundary of the project site.

Proposed Project

The proposed project (**Figure 1**) is designed consistent with the goals of the PDA Plan to provide a central business district, urban neighborhood, and new downtown area for the City. However, the proposed project includes modifying the approved PDA land use plan. Specifically, the Commercial Mixed-Use and Office zones within the Station Area subarea of the PDA would be combined into a single Mixed-Use zone that would permit retail, office, residential and hospitality uses, reducing the number of land use zones from five to three, as listed below. In addition, the proposed project includes a hotel within the Mixed-Use zone. Development of a hotel was assessed in the traffic study supporting the PDA Plan, but it was not specifically assumed to be located on the project site.

- **Mixed-Use** zone would permit retail, office, hospitality (including hotels, meeting and conference facilities and supporting food service) and residential (lofts) in a pedestrian-oriented environment in a horizontal or vertical mixed-use configuration, organized with residential densities up to 50 dwelling units per acre and a maximum floor area ratio (FAR) of 2.0. Community amenities for the public and residents are encouraged in this zone.

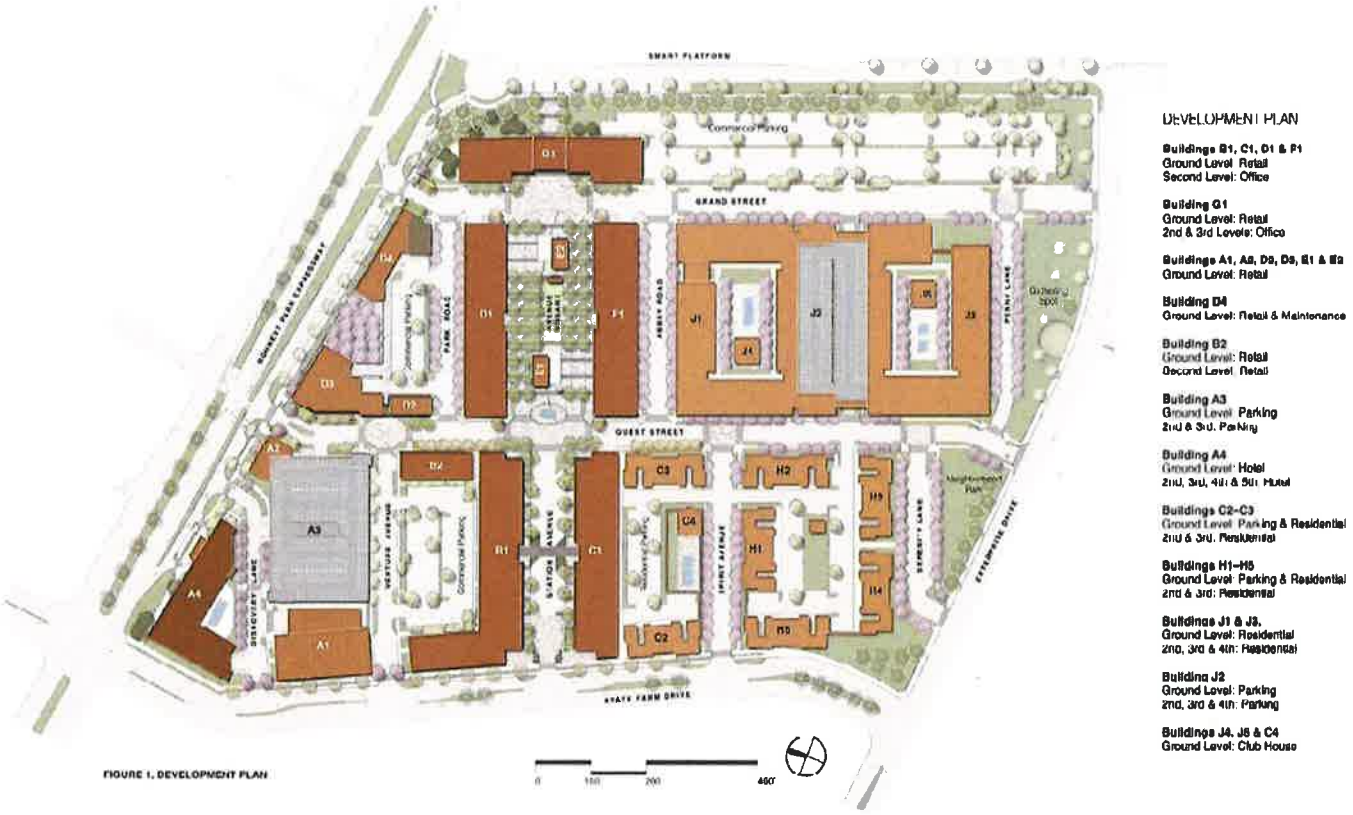
  The northern portion of the project site would include land designated for mixed-uses. A total of 17.9 acres would be designated for a mix of office, retail, residential and a hotel. A 156 room hotel is proposed at the corner of State Farm Drive and Rohnert Park Expressway. The proposed hotel is depicted as four-story, but the City's proposed Form Based Code would allow up to five stories. A total of 130,000 sf of office uses and 140,000 sf of retail uses are proposed in this portion of the project site in addition to 20 residential units. Buildings would range from single story up to five stories in height. Retail uses would primarily be provided on the ground floor with office uses occupying up to two floors.

  Within the northcentral portion of the project site flanked by two-story mixed-use buildings would be "Avenue Square", an outdoor central plaza designed to include restaurants, water features and informal seating areas for outdoor events. This area would be the site for civic and community events including seasonal festivals and markets, music events, and other public activities. A retail-oriented main street (Station Avenue) would lead into Avenue Square. The proposed building design would include a mix of metal, glass and concrete elements. The color palette would be neutral to include shades of brown, gray and white.

- **High Density Residential** zone would permit a wide range of detached single-family and multifamily housing, at densities ranging up to 75 units per gross acre. The High Density Residential zone would include 4.7 acres in the central portion of the project site. The remaining 440 residential units are proposed in this portion of the project site. No fireplaces would be included in any of the residential units.

Figure 1

Proposed Development Plan



- **Parks/Open Space** zone would permit publicly accessible, privately-owned open space and parks for use by the community. A total of 1.1 acres is designated for parks and open space throughout the project site. A total of 0.5 of an acre would be dedicated as a neighborhood park on the south side of the project adjacent to Enterprise Drive and would include a children's play scape area and dog park. An approximately 0.5 acre gathering spot would be located to the east of this park. In addition, approximately 0.1 of an acre of additional open space would be located near the intersection of State Farm Drive and Enterprise Drive.

As part of the Downtown District Amenity Zone within the PDA Plan, the City is proposing a Form Based Code that would provide more specific detail on urban form for projects within the Zone than is currently included in the PDA Plan. Components of the proposed project are consistent with the Form Based Code.

Table 1 provides a comparative summary of the land uses in the adopted PDA and those proposed by the project.

Table 1

Summary of Land Uses

Land Use	PDA Plan (square feet/units)	Proposed Project (square feet/units)	Change
Retail	171,626	140,000	-31,626
Office	65,340	130,000	+64,660
Total Non-Residential	236,966	270,000	+33,034
Residential	415[1]	460	+45
Hotel	0	156 rooms	+156 rooms

Note: [1] For the purposes of the PDA traffic report a total of 565 residential units were assumed. However the PDA project description notes 415 residential units.
Source: Rohnert Station Final Development Plan, September 11, 2018.

The proposed project would remove the two existing buildings (former State Farm Insurance building and City's Corporation Yard), surface parking lots, trees, and grass areas.

Access and Parking

Major on-site drive aisles would be constructed throughout the project site, including Grand Street, Quest Street, Station Avenue, and Spirit Avenue, which would serve as the main thoroughfares. Secondary drive aisles would connect various retail and residential parking lots to major drive aisles. Furthermore, the project would provide ride service drop-off locations throughout the site in areas of high pedestrian use.

Vehicle access would be provided at two locations along Rohnert Park Expressway, four locations along State Farm Drive, and three locations along Enterprise Drive. **Figure 2** illustrates the proposed parking locations and street system. Internal roadways are designed in a grid to facilitate easy access throughout the entire project site. A total of 1,529 parking spaces would be provided in a mix of on-street, structure and surface parking lots. A new left-turn lane would be added from south-bound Rohnert Park Expressway onto the project site (Quest Street). Furthermore, a shared-use local access eastbound lane would be added to Rohnert Park Expressway, along with street parking. In addition, one

lane would be removed from State Farm Drive, south of Venture Avenue and parallel parking spaces and a bike lane would be added.

Figure 2

Access and Parking

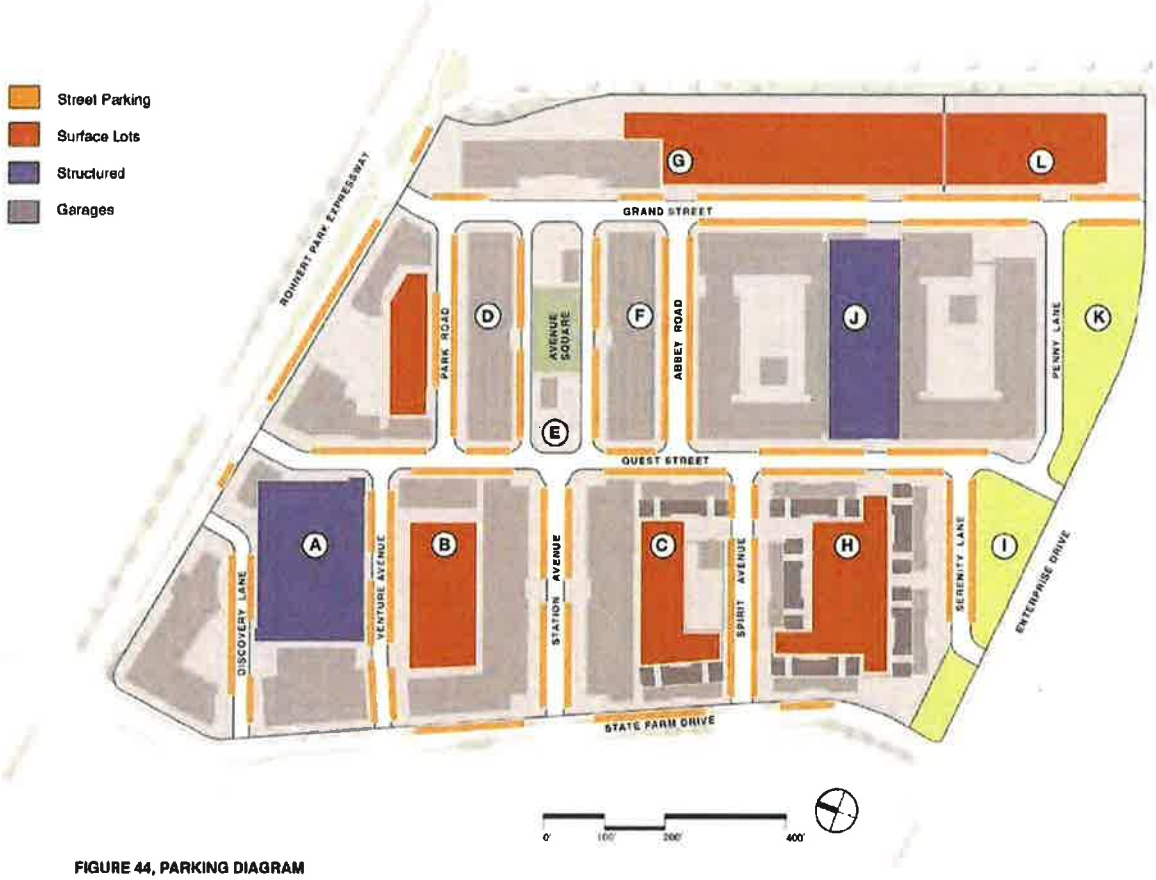


FIGURE 44, PARKING DIAGRAM

Transit, Bicycle and Pedestrian

A Sonoma-Marin Area Rail Transit (SMART) stop and train platform is located along the eastern boundary of the project site. The SMART train currently provides passenger rail service in Sonoma and Marin counties along 43 miles with 10 stations, from the Sonoma County Airport to Downtown San Rafael. Once completed 70 miles of passenger rail service would be available to serve the region from Larkspur to Cloverdale. The SMART program also includes a multi-use trail designed for bicycle and pedestrian use.

The trail is being completed in multiple phases and the segment of the trail that serves Rohnert Park is complete. The SMART trail also connects with the City's Copeland Creek trail, which can be accessed in two locations from Enterprise Drive near the project site.

The Station Avenue Project would be providing direct vehicular connection to the platform from a "slip street" location along Rohnert Park Expressway. This would allow for a bus to loop through the SMART parking lot. The Station Avenue Project is also proposing direct pedestrian access to the SMART station through a "portal" in the most easterly office building on the site.

Class II bike lanes are proposed along the south side of Rohnert Park Expressway, along the north side of Enterprise Drive, and along internal roadways such as Grand Street, Abbey Road, Spirit Avenue, and Penny Lane. A Class IV bike path (one way northbound) would be provided along the east side of State Farm Drive. Future plans for Rohnert Park Expressway could also include Class IV bike lanes. The project's street system would encourage low vehicle speeds which would allow for safe bicycle traffic on the internal project streets. Sidewalks are proposed along all roadways throughout the project site.

In addition, the Station Avenue Project includes an active pedestrian warning system such as a rapid rectangular flashing beacon at the State Farm Drive/Station Avenue intersection, a raised pedestrian island with new crosswalk at the Enterprise Drive/Quest Street intersection, and modification of the cycle track along the project's frontage of State Farm Drive between Discovery Street and Rohnert Park Expressway to include a landscaped buffer between the cycle track and roadway curb.

Landscaping

The project site contains approximately 735 trees comprised primarily of Coast Redwood trees (72%) in fair condition (Monarch Consulting Arborists 2018). The project would remove approximately 500 trees that are in poor health or need to be removed to accommodate new development. A landscaping plan for the project includes planting approximately 300 to 400 new trees.

Lighting

The project would include building lights, parking lot lights and street lights. All street lights would meet the City's Street Lighting Design Standards (January 2014) and building lights and parking lot lights would be designed consistent with Municipal Code Section 17.12.050, which requires lights be of the minimum illumination necessary directed downward and shielded at lot lines so as not to be directly visible from an adjoining residential district.

Utilities

Water

The project site is currently served by existing 8-inch and 10-inch water mains along the northern, western and southern boundaries of the project site. A 6-inch recycled water line is located along the eastern boundary of the project site. Water lines currently traverse the project site providing water to the existing buildings on the site. The project would connect to these existing water lines to create a looped water system to serve proposed new uses. The project would tie into the existing recycled water line to provide landscape irrigation.

Wastewater

The project site is currently served by an existing 8-inch sewer main located in State Farm Drive. This sewer main drains from State Farm Drive to Enterprise and Hunter Drive into a 21-inch collector sewer in Commerce Boulevard. The project would provide one connection to the existing sewer main in State Farm Drive to serve the project site. A series of sewer lines internal to the project, would serve the new buildings. The City's sewer capacity studies have determined the need to upsize the sewer mains in Enterprise and Hunter Drives to serve the project. Specific upsizing includes: 361 feet of 8-inch sewer to a 10-inch sewer line; 1,831 feet of 8-inch sewer to a 12-inch sewer line; and 837 feet of 1-inch sewer to a 15-inch sewer line.

Storm Drainage

There is an existing storm drainage system that serves the project site. The system includes an existing 18-inch storm drain line adjacent to Rohnert Park Expressway that drains into Hinebaugh Creek. A 42-inch storm drain line along State Farm Drive collects runoff from the northern portion of the site and drains into Copeland Creek. Lastly, there is a 48-inch storm drain line along Enterprise Drive that also drains into Copeland Creek. The project's storm drain system is designed to meet the City's Manual of Standards, Details and Specifications as well as the City of Santa Rosa's Low Impact Development (LID) Technical Design Manual, which requires stormwater generated by the 1-year, 24-hour storm be treated on-site and stored for infiltration or reuse. The project includes five connections to the City's existing storm drain system as well as a series of storage zones, roadside bio-retention features, permeable parking lot pavement and underground storage facilities to treat stormwater before discharging into the City's system.

The site's existing building and parking area have significant impervious surface which would affect the need for storm drainage improvements. Detention facilities for flows in excess of the 1-year, 24-hour storm are not currently shown in the development but a study to determine the need for site-specific detention facilities would be submitted with site grading and improvement plans per current City improvement requirements. If determined to be necessary, the project would include detention, beyond the LID requirements, to moderate increases in post-construction over pre-construction flows. Any needed facilities included in these plans would be constructed in compliance with the City's Manual of Standards (2014) for storm drains.

Sustainable Project Features and Transportation Demand Measures

The project has been designed to include a variety of energy-efficient and sustainable project features, as listed below.

- All project lighting would be LED, which is more energy efficient than other lighting types.
- Drought resistant palette of plants – 75% of the plant palette would be native or drought tolerant plants.
- Turf/lawn limited to 25% of the landscape area.
- Recycled water for irrigation.

Transportation demand measures (TDM) include the following:

- On-site TDM coordinator;
- Pedestrian amenities to include tree-lined and universal design sidewalks, curb extensions to slow traffic, safe pedestrian access to transit;
- Class 1 and Class 2 bicycle parking near residences, transit, and office uses, on-site bike share program, and bike valet parking for events in the Square greater than 1,000 people;
- Showers and lockers provided in office uses;
- Car share program and designated ride service pick up and drop off locations;
- Delivery service for groceries, sundry items, laundry, dry cleaning, etc., which may occur via bicycle;
- Shuttle bus service from the SMART station to regional destinations;
- Multi-modal wayfinding signage;
- Real time transportation information for all modes of transportation;
- Promotional campaigns to encourage the use of alternative modes of transportation and welcome packets for new residents and employees with information about alternative transportation options; and
- Monthly fee for residential parking space.

Construction Schedule

If the project is approved, construction is anticipated to take 2-3 years to complete. Construction in the northern portion of the project site is expected to be completed by October 2020. Construction of residences in the southern portion of the site is expected to be completed in 2021. Staging of construction equipment would be on-site, including construction employee vehicles.

Entitlements

The following list includes the required approvals for the proposed project:

- Conditional Use Permit for Final Development Plan phases;
- Conditional Use Permit for additional height;
- Tentative Map;
- Development Agreement; and
- Final Development Plan.

II. PDA EIR Impact Analysis Consistency Review

This section discusses the environmental impacts included in the PDA EIR, by resource topic, followed by a brief analysis of the proposed project's consistency with each of the impact conclusions and applicability of PDA EIR mitigation measures.

AIR QUALITY

Impacts associated with implementation of the PDA Plan were analyzed on a program-level basis in the PDA EIR. For purposes of the proposed project, an air quality and greenhouse gas (GHG) emissions assessment (Dudek 2018a) was prepared to estimate criteria air pollutant and GHG emissions from construction and operation of the project and evaluate whether there are any new significant environmental impacts resulting from project implementation that were not addressed and mitigated in the PDA EIR. This report, which was referenced to complete this section of the consistency analysis, is provided as Appendix A.

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. Criteria air pollutants that are evaluated include reactive organic gases (ROG; also referred to as volatile organic compounds (VOCs)), oxides of nitrogen (NO_x), carbon monoxide (CO), sulfur oxides (SO_x), particulate matter with an aerodynamic diameter less than or equal to 10 microns in size (PM_{10}), and particulate matter with an aerodynamic diameter less than or equal to 2.5 microns in size ($PM_{2.5}$). ROG and NO_x are important because they are precursors to ozone (O_3).

Toxic substances released into the air are considered toxic air contaminants (TACs). Toxic substances are those substances with the potential to cause adverse health effects in humans, including increasing the risk of cancer upon exposure or acute (short-term) and/or chronic (long-term) non-cancer health effects. Examples include certain aromatic and chlorinated hydrocarbons, diesel particulate matter (DPM), certain metals, and asbestos. TACs are generated by a number of sources, including stationary sources such as dry cleaners, gas stations, combustion sources, and laboratories; mobile sources, such as automobiles; and area sources, such as landfills. Adverse health effects associated with exposure to TACs may include carcinogenic (i.e., cancer-causing) and noncarcinogenic effects. Noncarcinogenic effects typically affect one or more target organ systems and may be experienced through either acute or chronic exposure to a given TAC.

Emissions from project construction activities were estimated using the California Emissions Estimator Model (CalEEMod) Version 2016.3.2. It was assumed that construction of the project would begin in November 2018 and would last approximately 18 months, ending in April 2020. The analysis was based on the following assumptions (duration of phases is approximate):

- Demolition: 2 months (November 2018–January 2019)
- Site Preparation/Grading: 3 months (January 2019–April 2019)
- Building Construction: 12 months (April 2019–April 2020)
- Architectural Coating: 2 months (February 2020–April 2020)
- Paving: 2 weeks (March 2020–March 2020)

For the project-level component of the consistency analysis, it was generally assumed that heavy construction equipment would be operating at the site for up to 11 hours per day (depending on phase), 5 days per week (22 days per month), during project construction. In addition to construction

equipment operation, emissions from worker trips and vendor trucks (i.e., delivery trucks) were estimated based on CalEEMod defaults. Vendor trucks transporting building materials were assumed for building construction. Default haul trucks for demolition material were reduced by 50% per applicant input, since debris would be ground on-site prior to off haul. It was assumed the entire 32-acre site would be graded and that soils would be balanced on-site.

Average daily emissions were computed by dividing the total construction emissions by the number of active construction days. The construction equipment mix and estimated hours of equipment operation per day used for the air emissions modeling of the project are provided in Appendix A, Table 1. Additional details regarding construction assumptions are provided in the modeling output included in Appendix A.

Emissions from the operational phase of the project were estimated using CalEEMod Version 2016.3.2. Operational year 2021 was assumed based on the first full year of operations. During long-term operations, the project would generate air pollutants and GHGs from mobile, energy, and area sources. GHGs would also be generated by solid waste. CalEEMod was used to estimate emissions from all these sources. Default daily vehicle trips for the project land uses were adjusted to match the 7,368 weekday trips estimated in the traffic report (W-Trans 2018 – included as Appendix G), which accounts for internal trip capture based on the mixed-use project, as well as mode share for bus and SMART rail and transportation demand management (TDM) measures as described in the *Traffic Impact Study* (TIS). The same adjustment factors used for the weekday trip generation were applied to the default Saturday and Sunday trip rates in CalEEMod. Notably, no fireplaces were assumed per the project description.

Default CalEEMod assumptions were used for building and lighting electricity use, generation of electricity associated with water supply, treatment, distribution and wastewater treatment, natural gas combustion, area sources (i.e., landscaping, consumer products, and architectural coatings for building maintenance) and solid waste disposal. However, for electricity, the CO_2 intensity was adjusted based on 33% renewables reported in the Pacific Gas and Electric (PG&E) 2016 Power Content Label (California Energy Commission [CEC] 2017). A 40% lighting energy reduction was also assumed from the use of high efficiency lighting that would be installed in all common areas, including streetlights, pedestrian pathway lights, area lighting for parking lots and parks, and outdoor lighting around public buildings. The project was also assumed to comply with the 75% diversion rate consistent with Assembly Bill (AB) 341 (Chesbro, Chapter 476, Statutes of 2011) (25% increase from the solid waste diversion requirements of AB 939, Integrated Waste Management Act). Finally, a 20% indoor and outdoor water reduction was assumed for California Green Building Standards Code (CALGreen) compliance.

Consistency Analysis of Impacts & Mitigation Measures

The impact discussion below follows the discussion in the PDA EIR. Consistent with the PDA EIR, the construction-related and operational project-level impacts on air quality are analyzed separately in the impact discussions below.

PDA EIR Impact 3.1a. Conflict with or obstruct implementation of the applicable air quality plan? Less-than-Significant Impact with Mitigation Incorporated.

Construction

The PDA EIR concluded that the PDA Plan's daily average construction-related emissions would exceed the Bay Area Air Quality Management District (BAAQMD) project-level threshold of significance for oxides of nitrogen (NO_X) emissions. The PDA EIR includes **Mitigation Measures 3.1-1** through **3.1-4** to reduce impacts associated with NO_X emissions during construction to a less-than-significant level. PDA EIR **Mitigation Measure 3.1-1** requires all projects within the Plan area to implement BAAQMD Basic Construction Control Measures. PDA EIR **Mitigation Measure 3.1-2** requires that individual projects within the Plan area, as part of project-level CEQA analyses, conduct an evaluation of construction air pollutant emissions for comparison to BAAQMD's thresholds of significance to determine potential project-level construction impacts and alter project components or construction techniques, as needed. PDA EIR **Mitigation Measure 3.1-3** includes additional site-specific BAAQMD construction control measures for exhaust-related emissions and PDA EIR **Mitigation Measure 3.1-4** includes additional control measures for fugitive dust emissions. The PDA EIR also includes **Mitigation Measure 3.1-5**, which provided for the use of the BAAQMD Carl Moyer Program to offset any construction-related NO_X emissions that exceed the BAAQMD 2010 threshold after implementation of PDA EIR **Mitigation Measures 3.1-1** through **3.1-4**.

The PDA EIR concluded that implementing PDA EIR **Mitigation Measures 3.1-1** through **3.1-5** would ensure that all construction-related emissions above BAAQMD thresholds of significance are reduced to a less-than-significant level. With construction-related emissions mitigated to below the BAAQMD CEQA thresholds of significance, the PDA EIR concluded that the PDA Plan would not conflict with or obstruct implementation of the Bay Area 2010 Clean Air Plan, and therefore impacts would be less than significant.

Operations

The PDA EIR concluded that the operational reactive organic gases (ROG) and NO_X emissions associated with buildout of the PDA Plan would exceed BAAQMD's maximum annual and daily average project-level thresholds. PDA EIR **Mitigation Measure 3.1-6** requires that individual projects within the Plan area, as part of project-level CEQA analyses, assess project operational air pollutant emissions for comparison to BAAQMD's thresholds of significance to determine potential project-level operational impacts and implement measures from the BAAQMD's Mitigation Measures for Operational Emissions, if required. With implementation of PDA EIR **Mitigation Measure 3.1-6**, the PDA EIR concluded that individual project-level operational impacts would be assessed and project-specific mitigation measures implemented to reduce operational ROG and NO_X emissions, which would help reduce operational emissions. The PDA EIR further noted that, in case project design features and additional mitigation measures do not reduce operational emissions to a less-than-significant level, PDA EIR **Mitigation Measure 3.1-5** would be implemented to use the Carl Moyer Program to offset regional off-site emissions to ensure that all emissions above BAAQMD thresholds are mitigated to a less-than-significant level. With operational emissions mitigated to below the BAAQMD CEQA thresholds of significance, the PDA EIR concluded that the PDA Plan would not conflict with or obstruct implementation of the 2010 CAP, and therefore operational impacts would be less than significant.

Station Avenue Study

In compliance with PDA EIR **Mitigation Measures 3.1-2 and 3.1-6**, which requires project-specific modeling for construction and operational air quality emissions, the proposed Station Avenue Project prepared the Air Quality and Greenhouse Gas Emissions study included as Appendix A. This study applied the BAAQMD Guidelines three-step (or three question) methodology for determining a project's consistency with the current Clean Air Plan.

The first question to be assessed in this methodology is "does the project support the goals of the Air Quality Plan"? The BAAQMD-recommended measure for determining project support for these goals is consistency with BAAQMD thresholds of significance. If a project would not result in significant and unavoidable air quality impacts, after the application of all feasible mitigation measures, the project would be consistent with the goals of the 2017 Clean Air Plan. The site-specific Air Quality and Greenhouse Gas Emissions study (Appendix A) indicates that the project would have less than significant construction and operational emission impacts after implementation of project-specific versions of PDA EIR **Mitigation Measures 3.1-1, 3.1-3, and 3.1-5** (referred to Mitigation Measures AIR-1, AIR-2 and AIR-3 in Appendix A) listed below. Therefore, the project would be considered to support the primary goals of the 2017 Clean Air Plan and is consistent with the current Clean Air Plan.

The second question to be assessed in this consistency methodology is "does the project include applicable control measures from the Clean Air Plan?" The 2017 Clean Air Plan contains 85 control measures aimed at reducing air pollution in the Bay Area. Projects that incorporate all feasible air quality plan control measures are considered consistent with the Clean Air Plan. As described in Appendix A, the project would employ all applicable control measures and, therefore, would be consistent with the 2017 Clean Air Plan.

The third question to be assessed in this consistency methodology is "does the project disrupt or hinder implementation of any control measures from the Clean Air Plan?" Examples of how a project may cause the disruption or delay of control measures include a project that precludes an extension of a transit line or bike path, or proposes excessive parking beyond parking requirements. The project would not create any barriers or impediments to planned or future improvements to transit or bicycle facilities in the area, nor would it include excessive parking. Therefore, the project would not hinder implementation of 2017 Clean Air Plan control measures.

In summary, the responses to all three of the questions with regard to Clean Air Plan consistency are affirmative and the project, with implementation of PDA EIR **Mitigation Measures 3.1-1, 3.1-3,** and **3.1-5,** would not conflict with or obstruct implementation of the 2017 Clean Air Plan. Consistent with the PDA EIR, this impact remains less than significant.

PDA EIR Impact 3.1b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation? Less-than-Significant Impact with Mitigation Incorporated

Construction

As discussed for Impact 3.1a above, the PDA EIR concluded that construction-related NO_x emissions would exceed the BAAQMD 2010 threshold of significance. Projects that generate air pollutant emissions exceeding applicable thresholds of significance are considered to cause a substantial contribution to regional air quality. The PDA EIR concluded that implementation of **Mitigation Measures 3.1-1** through **3.1-5**, as discussed under Impact 3.1a above, would ensure that construction-related air quality impacts remain less than significant.

Appendix A includes the project specific air quality and GHG emissions study required by PDA EIR **Mitigation Measure 3.1-2.** For the evaluation, the California Emissions Estimator Model (CalEEMod) Version 2016.3.2 was used to estimate emissions from construction and operation of the proposed project, using the assumptions outlined earlier in this section. The analysis concludes that construction of the project would result in NOx emissions that exceed the applicable BAAQMD significance threshold, which can be mitigated to a less than significant level by implementing PDA EIR **Mitigation Measures**

3.1-1 and 3.1-3. Since criteria air pollutant emissions generated by project construction would be less than significant after implementation of PDA EIR **Mitigation Measures 3.1-3** and **3.1-1**, PDA EIR **Mitigation Measures 3.1-4** and **3.1-5** would not apply to project construction.

Operations

As discussed under Impact 3.1a above, the PDA EIR concluded that the operational reactive organic gases (ROG) and NO_X emissions associated with buildout of the PDA Plan would exceed BAAQMD's maximum annual and daily average project-level thresholds. With implementation of PDA EIR **Mitigation Measure 3.1-6** and Policy L-8.4 of the PDA Plan, the PDA EIR concluded that individual project-level operational impacts would be assessed and project-specific mitigation measures implemented to reduce operational ROG and NO_X emissions, which would help reduce operational emissions. The PDA EIR further noted that, in case project design features and additional mitigation measures do not reduce operational emissions to a less-than-significant level, PDA EIR **Mitigation Measure 3.1-5** would be implemented to use the Carl Moyer Program to offset regional off-site emissions to ensure that all emissions above BAAQMD thresholds are mitigated to a less-than-significant level.

The PDA EIR also considers carbon monoxide (CO) impacts. The PDA EIR concludes that implementation of the Plan would not be expected to have the potential to generate CO hotspots, and associated impacts would be less than significant.

Station Avenue Study

Appendix A includes the project specific modeling for operational emissions, using the CalEEMOD model, required by PDA EIR **Mitigation Measure 3.1-6.** The analysis indicates that operation of the project would generate criteria pollutant (including ROG, NO_x, PM_{10}, and $PM_{2.5}$) emissions from mobile sources (vehicular traffic), area sources (consumer products, landscaping equipment), and energy sources (electrical consumption). Project-related operational daily and annual emissions of NO_x would exceed the BAAQMD significance threshold. Since on-road mobile sources are the primary emitter of the NO_x emissions and the modeling already accounted for inherent benefits of the project included in the traffic study (i.e., mixed-use internal trip capture and mode share/alternative transportation), implementation of PDA EIR **Mitigation Measure 3.1-5** would be applied to mitigate operational criteria air pollutant impacts through an off-site mitigation program.

In order to implement this mitigation, the developer would need to enter into a Memorandum of Understanding with the BAAQMD, which has structured its off-site mitigation program to be in line with the Carl Moyer Program, and pay the applicable offset fees. The developer would need to provide the City with documentation of its compliance with the Memorandum of Understanding. Alternatively, the City of Rohnert Park would enter into a MOU (funded by the developer) with the BAAQMD to fund emission reduction programs. Notably, offset fees change from year to year, with the latest estimate of ozone precursor (i.e., ROG plus NO_x) fees at $34,900 per ton. As suggested by the BAAQMD for application of off-site mitigation to long-term operations, future years of project operations were modeled in order to determine how many years of operations exceed the applicable thresholds and would need off-site mitigation. This approach accounts for the general reduction of on-road vehicle emissions over time, based on cleaner engine requirements. As described in Appendix A, the modeling indicates that the project would result in NO_x emissions that exceed the BAAQMD threshold in years 2021 (by 1.17 tons) and 2022 (by 0.62 tons) that would be required to be offset by contributing to an off-site mitigation program. Emissions associated with project operations would be less than significant

by year 2023. With implementation of PDA EIR **Mitigation Measure 3.1-5**, long-term operational emissions of criteria air pollutants would be consistent with the analysis in the PDA EIR and be less than significant.

PDA EIR Impact 3.1c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)? Less-than-Significant Impact with Mitigation Incorporated.

Past, present, and future development projects may contribute to the region's adverse air quality impacts on a cumulative basis. Per BAAQMD's CEQA Guidelines, by its nature air pollution is largely a cumulative impact; no single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. In developing thresholds of significance for air pollutants, BAAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be considered cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. Therefore, if the project's emissions are below the BAAQMD thresholds or screening criteria, then the project's cumulative impact would be considered to be less than significant.

As described in Impact 3.1b above, criteria pollutant emissions generated by short-term construction and long-term operations of the project would not exceed the BAAQMD significance thresholds after implementation of the specified PDA EIR Mitigation Measures. Thus, cumulative impacts would be consistent with the PDA EIR and continue to be less than significant in relation to regional emissions. In addition, project-related traffic would not exceed the BAAQMD carbon monoxide screening criteria and would continue to result in a less-than-significant cumulative impact.

PDA EIR Impact 3.1d. Expose sensitive receptors to substantial pollutant concentrations? Less-than-Significant Impact with Mitigation Incorporated.

PDA EIR **Mitigation Measure 3.1-7** and **3.1-8** in the PDA EIR require projects within the Plan area to conduct an assessment of health impacts related to project-specific construction and operational PM and TAC emissions and if necessary, implement mitigation measures to reduce health impacts to a less-than-significant level. The PDA EIR concludes that implementation of these Mitigation Measures would ensure that sensitive receptors are not exposed to substantial pollutant concentrations and impacts would remain less than significant.

The air quality analysis, included in Appendix A and summarized below, evaluated the health risk impacts related to project construction and operational emissions, as required by PDA EIR **Mitigation Measures 3.1-7** and **3.1-8.**

Health Impacts of Toxic Air Contaminants

The BAAQMD has adopted project and cumulative thresholds for three risk-related air quality indicators for sensitive receptors: cancer risks, non-cancer health effects, and increases in ambient air concentrations of $PM_{2.5}$. These impacts are addressed on a localized rather than regional basis and are specific to the sensitive receptors identified for the project. The closest existing sensitive receptors include mobile homes located approximately 125 feet to the east of the project boundary, multi-family residences located approximately 150 feet to the south of the project boundary, and multi-family residences approximately 350 feet to the west of the project boundary.

Construction Health Risk

Project construction activities would produce DPM (with PM_{10} exhaust modeled as surrogate) and $PM_{2.5}$ emissions due to equipment such as loaders, backhoes, and haul truck trips. These emissions could result in elevated concentrations of DPM and $PM_{2.5}$ at nearby receptors, which could lead to an increase in the risk of cancer or other health impacts. Consequently, a health risk assessment was performed for the proposed project to determine the extent of increased cancer risks and hazard indices at the maximally exposed receptors.

The maximally exposed receptor would be the nearest existing residential mobile home to the east of the project. The incremental cancer risk at the maximally exposed sensitive receptor of 81.90 in one million (assuming exposure starts in 3rd trimester) from project construction would exceed the BAAQMD threshold of 10 in a million without mitigation. With incorporation of higher tier engines as included in PDA EIR **Mitigation Measure 3.1-3**, the project would result in incremental cancer risk of 8.89 in one million. The unmitigated and mitigated chronic hazard index would be 0.063 and 0.0068 at the maximally exposed individual residential receptor, respectively, which would be below the BAAQMD threshold of 1.0. The maximum annual unmitigated $PM_{2.5}$ concentration would be 0.32 micrograms per cubic meter (µg/m3) for the maximally exposed individual residential receptor, which would exceed the BAAQMD threshold of 0.3 µg/m3. Finally, the maximum annual mitigated PM2.5 concentrations would be 0.034 µg/m3, which is below the BAAQMD threshold of 0.3 µg/m3. Thus, consistent with the PDA EIR, project health risk impacts would be less than significant after mitigation. Notably, for demolition activities, structures to be demolished sometimes contain asbestos-containing material (ACM). Demolition of existing buildings and structures would be subject to BAAQMD Regulation 11, Rule 2 (Asbestos Demolition, Renovation, and Manufacturing). BAAQMD Regulation 11, Rule 2 is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of ACM generated or handled during these activities. All ACM found on site would be removed prior to demolition or renovation activity in accordance with BAAQMD Regulation 11, Rule 2, including specific requirements for surveying, notification, removal, and disposal of ACM. The project is required to comply with BAAQMD Regulation 11, Rule 2, ensuring that ACMs would be removed and disposed of appropriately and safely. Complying with BAAQMD Regulation 11, Rule 2 would minimize the release of airborne asbestos emissions; therefore, demolition activity would be consistent with the PDA EIR and result in a less-than-significant impacts to nearby sensitive receptors.

Operational Health Risk

Regarding long-term operations, based on the proposed land uses, the project would not result in any long-term sources of TACs; therefore, PDA EIR **Mitigation Measure 3.1-8** would not be applicable. Further, the project would not result in non-permitted stationary sources that would emit air pollutants or TACs.

Cumulative Health Risk

Since sensitive receptors would be located at the project, PDA EIR **Mitigation Measure 3.1-9** would be applicable and a cumulative health risk assessment was performed in order to evaluate land use compatibility for the future sensitive receptors (residents) located at the project. TACs produced at distant locations do not readily combine to create concentrations at any single location that would cause health risks. The BAAQMD method for determining health risk requires the review of health risk from permitted sources, railroads, and major streets in the vicinity of a project site (i.e., within 1,000 feet of the proposed new sensitive receptors on the project site), then adding the project operational

impacts to determine whether the cumulative health risk thresholds are exceeded. BAAQMD has developed a geo-referenced database of permitted emissions sources throughout San Francisco Bay Area for estimating health risks to new sensitive receptors from existing permitted sources. Risk associated with four stationary sources within 1,000 feet of the project was provided by BAAQMD, including a Chevron gas station, an emergency generator at City Hall, and a generator and gas station at the City Corporation Yard. The Corporation Yard sources would be removed from the site as part of the project and would not contribute to cumulative risk during operations.

The dispersion and health risk of SMART rail operations (train travel and idling) and on-road diesel vehicle emissions along Rohnert Park Expressway, State Farm Drive, and Enterprise Drive were modeled, along with meteorological data provided by the BAAQMD for the project area. The risk to residents at the project assumes exposure would occur 24 hours per day, 7 days per week, for a 30-year duration, with exposure assumed to start in the 3rd trimester of pregnancy.

Unlike for a project level assessment, for the cumulative assessment the risks from all sources within 1,000 feet of project sensitive receptors are summed and compared to a cumulative significance threshold. Notably, no on-site stationary sources of TACs were identified and project-generated diesel traffic would be negligible.

The cumulative maximally exposed individual resident would be on the eastern boundary of the project site, adjacent to the SMART rail station. As demonstrated in the Air Quality and Greenhouse Gas Emissions Analysis, health impacts on the proposed sensitive receptors from all proximate sources would be below the BAAQMD cumulative thresholds for cancer risk, chronic health hazards, and $PM_{2.5}$ concentrations.

The cumulative cancer risk from all sources within 1,000 feet of proposed sensitive receptors would be approximately 29.85 in one million, which would be below the BAAQMD cumulative threshold of 100 in one million and would be less than significant. The cumulative hazard index from all such sources would be approximately 0.032, which is well below the significance threshold of 10 and would be less than significant. The cumulative $PM_{2.5}$ concentration would be approximately 0.029 µg/m3, which would be below the significance threshold of 0.8 µg/m3 and hence is considered less than significant.

Health Impacts of Carbon Monoxide

The BAAQMD thresholds of significance for local CO emissions is the 1-hour and 8-hour CAAQS of 20 parts per million and 9 parts per million, respectively. These represent levels that are protective of public health. In regards to localized CO concentrations, according to the BAAQMD thresholds, a project would result in a less than significant impact if the following screening criteria are met:

1. The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, regional transportation plan, and local congestion management agency plans.
2. The project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.
3. The project traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

Based on the peak hour volumes in the traffic report, the highest volume intersection would be Rohnert Park Expressway and State Farm Drive, with approximately 2,459 vehicles in the peak hour under the "Existing plus Approved and Project" scenario (W-Trans 2018). Accordingly, the project would comply with the BAAQMD screening criteria and project-related traffic would not exceed CO standards. This CO emissions impact would be consistent with the PDA EIR and considered less than significant on a project-level and cumulative basis.

Health Impacts of Other Criteria Air Pollutants

ROG and NO_x are precursors to O_3, for which the SFBAAB is designated as nonattainment with respect to the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS). The health effects associated with O_3 are generally associated with reduced lung function. The contribution of ROG and NO_x to regional ambient O_3 concentrations is the result of complex photochemistry. The holistic effect of a single project's emissions of O_3 precursors is speculative due to the lack of quantitative methods to assess this impact. Nonetheless, the ROG and NO_x emissions associated with project construction and operation could minimally contribute to regional O_3 concentrations and the associated health impacts. PDA EIR **Mitigation Measure 3.1-3** and PDA EIR **Mitigation Measure 3.1-5** would reduce NO_x emissions to less than significant levels either directly or through off-site mitigation, would reduce O_3 precursor emissions in the region, health impacts would be consistent with this analysis and be less than significant.

Construction and operation of the project would not exceed the thresholds for PM_{10} or $PM_{2.5}$ and would not contribute to exceedances of the respective NAAQS and CAAQS or obstruct the SFBAAB from coming into attainment for these pollutants. Additionally, the project would be required to comply Mitigation Measures AIR-1 (PDA EIR **Mitigation Measure 3.1-3**) and AIR-2 (PDA EIR **Mitigation Measure 3.1-1**), which limit the amount of exhaust PM and fugitive dust generated during construction, respectively. With compliance with the required mitigation measures and the minimal contribution of particulate matter during construction and operation, health impacts would be consistent with the PDA EIR and be less than significant.

Construction and operation of the project would not contribute to exceedances of the NAAQS and CAAQS for NO_2. Health impacts that result from NO_2 and NO_x include respiratory irritation, which could be experienced by nearby receptors during the periods of heaviest use of off-road construction equipment. However, project construction would be relatively short term, and off-road construction equipment would be operating at various portions of the site and would not be concentrated in one portion of the site at any one time. In addition, existing NO_2 concentrations in the area are well below the NAAQS and CAAQS standards. Construction and operation of the project would not require use of any stationary sources (e.g., diesel generators) that would create substantial, localized NOx impacts. Therefore, potential health impacts associated with NO_2 and NO_x would be consistent with the PDA EIR and be less than significant.

CO tends to be a localized impact associated with congested intersections. The associated potential for CO hotspots were discussed previously and are determined to be a less-than-significant impact. Thus, the project's CO emissions would not contribute to significant health effects associated with this pollutant.

In summary, construction and operation of the project would result in emissions that would not exceed the BAAQMD thresholds for ROG, PM_{10}, or $PM_{2.5}$, without implementation of mitigation measures. For NO_x, emissions would be reduced to less-than-significant levels after implementation of Mitigation PDA

EIR **Mitigation Measure 3.1-3** and PDA EIR **Mitigation Measure 3.1-5**. Fugitive dust emissions would be considered less than significant with implementation of PDA EIR **Mitigation Measure 3.1-1**. Therefore, potential health impacts associated with criteria air pollutants would be less than significant and consistent with the PDA EIR, with no additional significant impacts not addressed or mitigated.

PDA EIR Impact 3.1e. Create objectionable odors affecting a substantial number of people? Less-than-Significant Impact with Mitigation Incorporated.

The PDA EIR includes **Mitigation Measure 3.1-10**, which requires an assessment of odor impacts from individual projects within the Plan area and also requires implementation of best management practices and odor control technology would prevent objectionable odors from affecting a substantial number of people. The PDA EIR concluded that implementation of this measure would ensure that odor-related impacts remain less than significant.

In compliance with PDA EIR **Mitigation Measure 3.1-10**, the Air Quality and Greenhouse Gas Emissions study (Appendix A) included consideration of odor impacts. As noted in the study, BAAQMD has identified typical sources of odor in the CEQA Air Quality Guidelines, a few examples of which include manufacturing plants, rendering plants, coffee roasters, wastewater treatment plants, sanitary landfills, and solid waste transfer stations. While sources that generate objectionable odors must comply with air quality regulations, the public's sensitivity to locally produced odors often exceeds regulatory thresholds. The project would not include uses that have been identified by BAAQMD as potential sources of objectionable odors. Potential odor impacts would be consistent with the PDA EIR.

Cumulative Impacts

The PDA EIR concluded that, with implementation of applicable mitigation measures, the PDA would not significantly contribute to cumulative air quality impacts. The Station Avenue Project is consistent with the PDA Plan and would implement applicable mitigation measures contained in the PDA EIR and therefore would not significantly contribute to cumulative air quality impacts.

Summary of Applicable Mitigation Measures

The PDA EIR mitigation measures for Air Quality that are applicable to the Station Avenue Project are summarized below. The entire measures can be found in the Station Avenue MMRP in Appendix H.

- 3.1-1 Implement BAAQMD Basic Construction Control Measures.
- 3.1-2 Assess Criteria Pollutant Emissions Associated with Site-Specific Construction and Alter Project Details and/or Construction Equipment as Needed.
- 3.1-3 Implement Applicable Site-Specific BAAQMD Additional Construction Control Measures for Exhaust-Related Emissions.
- 3.1-4 Implement Applicable Site Specific BAAQMD Additional Construction Control Measures for Fugitive Dust Emissions.
- 3.1-5 Use BAAQMD Carl Moyer Program (CMP) to Offset Project-Specific Regional Emissions.
- 3.1-6 Assess Criteria Pollutant Emissions Associated with Site-Specific Operations and Implement BAAQMD Operational Emissions Mitigation Measures.
- 3.1-7 Assess Toxic Air Contaminant Emissions and Health Risks Associated with Site-Specific Construction.
- 3.1-8 Assess Toxic Air Contaminant Emissions and Health Risks Associated with State-Specific Operations and Implement Applicable BAAQMD Health Risk Mitigation Measures.

- 3.1-9 Assess Local and Community Hazard Risks Associated with Project-Specific Operation and Implement Applicable BAAQMD Community Risk and Hazard Mitigation.
- 3.1-10 Assess Odors Associated with Project-Specific Operation and Implement Applicable BAAQMD Odor Mitigation Measures.

BIOLOGICAL RESOURCES

Impacts associated with implementation of the PDA Plan were analyzed on a program-level basis in the PDA EIR. For purposes of assessing consistency with the PDA EIR and whether there are any new significant impacts, the following reports were completed:

- *Biological Constraints Report for the Proposed Rohnert Station Project Site* (Dudek 2018b)
- *Review of Potential Wetlands and Waters of the United States for the Proposed Rohnert Station Project Site in Rohnert Park, Sonoma County, California* (Dudek 2018c)
- *Rohnert Station Arborist Site's Overview* (Monarch Consulting Arborists June 19, 2018).
- *Tree Survey Report North Bay Community Rohnert Park, California* (WRA Environmental Consultants June 26, 2014).

The biological constraints and wetland reports, which were referenced to complete this section, are provided as Appendix B. The arborist report and tree survey, which are also referenced, are provided as Appendix C.

The Station Avenue Project site is developed with two abandoned buildings, the existing City Corp yard building, associated parking lots and driveways, ornamental landscaping, and some native woodlands in the northernmost portion of the site. The site is relatively flat with an elevation of approximately 98 feet above mean sea level. Historically, the site has been altered by agriculture, placement of fill, and grading activities associated with development. The site is located in a developed urban area surrounded by existing public/institutional, residential, and regional commercial land uses.

At the time of the 2018 site visit, two natural land covers and two non-natural land cover types were classified for the project site: the natural land cover types included Fremont cottonwood forest (totaling 1.67 acres) and Harding grass sward (0.08 ac), while the non-natural land cover types included developed landscape (18.25 ac) and ornamental plantings, which consists largely of planted redwood (*Sequoia sempervirens*) and London planetree (*Platanus ×hispanica*). (9.82 ac). The Fremont cottonwood forest and Harding grass sward are potentially significant resources. Within the project site, Harding's grass association occurs in a very small area in the southeastern corner of the site and consists of Harding's grass, fennel (*Foeniculum vulgare*), and ripgut brome (*Bromus diandrus*). This area is fairly disturbed and appears to have been formed during grading actives in the past and holds more water than the surrounding areas due to its depressional nature. Fremont cottonwood forest occurs in the northern portion of the project site and consists of Fremont cottonwood and sweetgum (*Liquidambar styraciflua*) trees. On the site, this habitat type appears to be a remnant forest within a manicured, park-like setting. In addition, the site was evaluated for the presence of waters of the United States (wetlands)

Five common species of wildlife were recorded within and adjacent to the project site during the site visit. Given the highly disturbed nature of the site and the extensive amount of development surrounding the site and in the site vicinity, wildlife use is expected to be limited to common species

adapted to urban settings and human disturbance such as raccoon (*Procyon lotor*), Virginia opossum (*Didelphis virginiana*), and striped skunk (*Mephitis mephitis*).

Consistency Analysis of Impacts & Mitigation Measures

The impact discussion below follows the discussion in the PDA EIR .

PDA EIR Impact 3.2a: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? Less-than-Significant Impact with Mitigation Incorporated.

The PDA EIR concluded that, although special-status plant species are unlikely to be present in the Plan area because of the prevalence of existing development and ruderal vegetation, it is not possible to completely rule out their potential presence. PDA EIR **Mitigation Measure 3.2-1**, which provides guidance for conducting botanical pre-construction surveys during the appropriate phenological (study in relation to season) periods for plants was included in the EIR to reduce impacts on special-status plant species to a less-than-significant level. The Biological Constraints Report prepared for the proposed project, included in Appendix B, found that a total of 64 special-status plant species are known to occur within the area surrounding the project site; however, no special-status plant species are known to occur within the project site. Of these, 57 were removed from consideration based on lack of suitable soils or habitat on the site, or because the project site is outside of the known elevation or geographic range for the species. The remaining seven species are unlikely to occur on site due to the level of anthropogenic disturbance. Based on these findings, the proposed project would not be required to implement PDA EIR **Mitigation Measure 3.2-1** as potential impacts to special-status plants would be less than significant.

The PDA EIR concluded that suitable nesting habitat exists on-site for other non-special-status migratory birds and raptors and that nesting activities of these birds could be directly affected by development activities within the Plan area. To ensure impacts on special-status and migratory bird species are reduced to a less than significant level, the PDA EIR included **Mitigation Measure 3.2-2.** This measure requires nesting surveys prior to the start of construction.

As concluded in the Biological Constraints Report prepared for the proposed project, a total of 35 special-status wildlife species are known to occur within the project quadrangle or eight surrounding quadrangles; however, no special-status wildlife species are known to occur within the project site or in the immediate project site vicinity. Of these 35 species, 31 were removed from consideration based on lack of suitable habitat or because the site is outside of the known geographic or elevation range for the species. One sensitive bird species, white tailed kite (*Elanus leucurus*) is known to occur within the project area. However, due to the heavily disturbed nature of the site, lack of foraging habitat, and surrounding high density development, this species is not expected to be present on the project site. Furthermore, three special-status bat species: pallid bat (*Antrozous pallidus*), Townsend's big-eared bat (*Corynorhinus townsendii*), and western red bat (*Lasiurus blossevillii*), are known to occur within the project area. However, given the highly disturbed nature of the site and the extensive and dense level of development surrounding the site, the potential for these species to occur is considered low.

The Biological Constraints Report prepared for the project also notes that the landscaped areas and cottonwood trees within the project site provide nesting habitat for native birds protected by the federal Migratory Bird Treaty Act and the California Fish and Game Code. Destruction or other adverse

impacts to active nests with eggs or chicks during construction could result in a violation of these regulations. Accordingly, the project would implement PDA EIR **Mitigation Measure 3.2-2,** which requires preconstruction nesting bird surveys prior to the start of construction, which would address any impacts, consistent with the PDA EIR, and ensure impacts to migratory birds and raptors remain less than significant.

The destruction of active bat roost sites during demolition of existing buildings and construction is addressed in PDA EIR **Mitigation Measure 3.2-4**, which would require the project would retain a qualified biologist to conduct surveys prior to vegetation or building removal for special-status bat species. The recommended protocol for the bat preconstruction surveys is set forth in the site-specific study in Appendix B. Potential impacts related to special-status bat species were, therefore, addressed and mitigated in the PDA EIR and there are no additional significant impacts.

PDA EIR **Mitigation Measure 3.2-3**, which requires use of specific erosion control materials to reduce the potential for entrapment of special-status species, would also be implemented by the proposed project as a means to reduce impacts related to the potential for the incidental trapping of wildlife. PDA EIR **Mitigation Measure 3.2-4**, which requires pre-construction surveys for amphibian species, would be required at the discretion of a qualified biologist based on the potential for biological resources to be affected. Prior to the start of construction on-site, a review of the project conditions by a qualified biologist would determine the need for pre-construction amphibian surveys. Finally, a Stormwater Pollution Prevention Plan (SWPPP) and a site-specific erosion control plan would be required to avoid impacts to aquatic species and water quality of the creeks, per PDA EIR **Mitigation Measures 3.7-1** and **3.7-2**.

Implementation of the applicable mitigation measures, as required by and consistent with the PDA EIR, would ensure that the project has less than significant impacts to nesting birds, bats, and other special-status species.

PDA EIR Impacts 3.2b-c. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? Less-than-Significant Impact with Mitigation Incorporated.

No project-related construction activities would occur within streams or associated riparian habits. However, as noted in the PDA EIR, runoff or accidental spills associated with construction activities within the PDA could result in impacts to riparian habitats. Increased turbidity and increased levels of pollutants could degrade the quality of riparian areas, and would make them less useful as wildlife corridors and habitat. Hinebaugh Creek is located approximately 0.1 miles north of the project area and Copeland Creek is located approximately 0.2 miles south of the project area. Consistent with the PDA EIR and as a means to ensure that impacts to nearby waterways, including Hinebaugh and Copeland Creeks, resulting from runoff or accidental spills remain less than significant, the project would implement PDA EIR **Mitigation Measures 3.7-1** and **3.7-2**. As discussed under Impact 3.2a above, implementation of these measures, which require preparation of a site-specific erosion control plan and SWPPP, would reduce impacts from construction-related soil erosion. In addition, the project would implement PDA EIR **Mitigation Measure 3.7-3** to reduce the potential for the incidental trapping of wildlife. This measure prohibits the use of plastic monofilament netting (e.g., erosion control matting or

wattles) in areas with sensitive habitats. Implementation of these measures, as required by the PDA EIR, would serve to reduce potential impacts to nearby waterways and associated habitats to a less-than-significant level, consistent with the PDA EIR.

The Biological Constraints Report included in Appendix B identifies a Fremont's cottonwood forest on the site, which is typically considered a sensitive natural community. However, this habitat type is of poor quality due to the manicured nature of the grounds, ruderal understory, and limited extent of the grove of trees Therefore, the impact to sensitive natural communities would remain less than significant, consistent with the PDA EIR, with incorporation of the aforementioned mitigation measures included in the PDA EIR.

The project site also supports a Harding's grass association in a very small area in the southeastern corner of the site, which could be indicative of waters of the United States and waters of the state. However, site investigation and analyses conducted as part of the jurisdictional delineation included the assessment of vegetation, soils, and hydrology at two data station locations throughout at the proposed project site to determine the presence or absence of wetlands field indicators or evidence of Ordinary High Water Mark indicators. Results from the two data stations sample points document that neither of the sampled areas met the wetland criteria by fulfilling all three required parameters for wetland vegetation, hydric soils, or hydrology. Accordingly, the project would not result in substantial adverse effects to wetlands. As previously mentioned, PDA EIR **Mitigation Measures 3.7-1** and **3.7-2** would reduce impacts to offsite waterways, including Hinebaugh and Copeland Creeks, to a less-than-significant level and there are no additional significant impacts.

PDA EIR Impact 3.2d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? Less-than-Significant Impact.

Consistent with the PDA EIR conclusions, no development activities would occur within the perennial stream wildlife corridors in the Plan area and the project footprint does not function as an important corridor between larger open space wildlife areas due to the developed nature of the surrounding area. Therefore, there would be no additional impact on wildlife corridors and impacts would be less than significant, as concluded in the PDA EIR.

PDA EIR Impact 3.2e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? Less-than-Significant Impact with Mitigation Incorporated.

According to the arborist site overview, the project site contains approximately 735 trees. Approximately 72 percent of the trees on-site are Coast Redwoods in fair condition due to a combination of drought conditions and change in campus management. According to the applicant, the project would remove approximately 500 trees due to poor health and to accommodate new development and would plant approximately 300 to 400 replacement trees. Final construction plans would indicate any proposed removal of protected trees. A site-specific tree mitigation and replacement plan would be required for removal of protected trees per **Mitigation Measure 3.2-5** of the PDA EIR. As concluded in the PDA EIR, implementation of PDA EIR **Mitigation Measure 3.2-5**, which requires compliance with the City's regulations and requirements for securing a tree removal permit, would reduce the impact to a less-than-significant level.

PDA EIR Impact 3.2f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? No Impact.

Although the project site is located within the Santa Rosa Plain Conservation Strategy area, the site is located over 1.3 miles from a known or extirpated breeding pool of California tiger salamander (CTS; *Ambystoma californiense*) and there is no suitable habitat for this species located on site Therefore, as discussed in the PDA EIR, no drafted or adopted conservation plans are in place that would apply to the PDA Plan or affect the Plan area and no impact would occur.

Cumulative Impacts

The PDA EIR concluded that implementation of the PDA Plan would not significantly contribute to cumulative impacts to biological resources. Impacts associated with the Station Avenue Project are consistent with the PDA Plan and all applicable PDA EIR mitigation measures would be implemented. The project would not significantly contribute to cumulative impacts to biological resources, consistent with the PDA EIR.

Summary of Applicable Mitigation Measures

The PDA EIR mitigation measures for Biological Resources that are applicable to the Station Avenue Project are summarized below. The entire measures can be found in the Station Avenue MMRP in Appendix H.

- 3.2-2 Conduct Site-Specific Preconstruction Nesting Bird Surveys and Implement Protective Actions if Active Nests Are Detected.
- 3.2-3 Implement Site-Specific Natural Erosion Control Materials to Reduce the Potential for Entrapment of Special-Status Species.
- 3.2-4 Conduct Site-Specific Preconstruction Surveys and Implement Protective Actions if Special-Status Species Are Identified.
- 3.2-5 Prepare and Implement Site-Specific Tree Mitigation and Replacement Plans.

CULTURAL RESOURCES

Impacts associated with implementation of the PDA Plan were analyzed on a program-level basis in the PDA EIR. Because of the highly developed and disturbed nature of this site, no additional site-specific studies are required by the PDA EIR.

Consistency Analysis of Impacts & Mitigation Measures

The impact discussion below follows the discussion in the PDA EIR.

PDA EIR Impact 3.3a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5? No Impact.

As discussed in the PDA EIR, there are currently no known historical resources or no built-environment cultural resources in the Plan area. Therefore and as concluded in the PDA EIR, no impact would occur with development of the proposed project and no mitigation is required.

PDA EIR Impacts 3.3b and 3.3e. Cause a substantial adverse change in the significance of an archeological resources pursuant to §15064.5? Disturb any human remains, including those interred outside of formal cemeteries? Less-than-Significant Impact with Mitigation Incorporated.

The PDA EIR indicates that there are no known archaeological resources in the Plan area. The Plan area is covered in alluvial fans, which have been known to contain buried archaeological resources. Per PDA EIR **Mitigation Measure 3.3-1**, the project would be required to conduct resource evaluation and develop and implement a treatment plan should there be any unanticipated discovery of cultural resources. This would reduce potential impacts to less than significant.

No human remains have been previously identified in the plan area. Nevertheless, it is possible that buried human remains are present. The project would implement site-specific procedures for inadvertent discovery of human remains, per PDA EIR **Mitigation Measure 3.3-2**.

Implementation of these PDA EIR mitigation measures would ensure potential impacts remain less than significant, as concluded in the PDA EIR.

PDA EIR Impact 3.3c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? Less-than-Significant Impact.

The PDA EIR found that the geologic features within the already developed PDA Plan area, including the Station Avenue Project site, are not considered to be paleontologically sensitive. Therefore, impacts associated with the proposed project would be less than significant.

PDA EIR Impact 3.3d. Cause a substantive adverse change in the significance of a tribal cultural resource pursuant to §15064.5? No Impact.

The PDA EIR concluded that the Plan area, including the Station Avenue Project site, is not considered sensitive for tribal cultural resources. Therefore, implementation of the proposed project would have no impact to tribal cultural resources consistent with the PDA EIR.

Cumulative Impacts

The project would not contribute to cumulative impacts to tribal cultural resources or historic and archaeological resources. Because the project would not include excavation deep enough to reach Pleistocene deposits, the project would not result in a cumulatively considerable incremental contribution to a potentially significant cumulative impact related to unique paleontological resources, consistent with the PDA EIR.

Mitigation Measures

The PDA EIR mitigation measures for Cultural Resources that are applicable to the Station Avenue Project are summarized below. The entire measures can be found in the Station Avenue MMRP in Appendix H.

- 3.3-1 Implement Site-Specific Procedures for Inadvertent Discovery of Cultural Resources.

- 3.3-2 Implement Site-Specific Procedures for Inadvertent Discovery of Human Remains.

GEOLOGY AND SOILS

Impacts associated with implementation of the PDA Plan were analyzed on a program-level basis in the PDA EIR. A Preliminary Geotechnical Investigation (Miller Pacific Engineering Group, 2018) was prepared for the proposed project. The purpose of the investigation was to explore subsurface conditions within the proposed development area, and to develop preliminary geotechnical criteria for planning, design and construction of the proposed improvements. This results report, which is included as Appendix D of this document, are summarized in the impact analyses below.

Consistency Analysis of Impacts & Mitigation Measures

The impact discussion below follows the discussion in the PDA EIR.

PDA EIR Impact 3.4a.i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Less-than-Significant Impact.

Because the Plan area is not located within an Alquist-Priolo Earthquake Fault Zone nor is it located within or immediately adjacent to the trace of any other known fault, surface fault rupture in the Plan area, including at the Station Avenue Project site, is unlikely and potential impacts would be considered less than significant, as concluded in the PDA EIR.

PDA EIR Impact 3.4a.ii. Strong seismic ground shaking? Less-than-Significant Impact with Mitigation Incorporated.

To address potential seismic-related ground shaking and ground failure, and unstable or expansive soil within the PDA, individual projects are required to submit site-specific geotechnical reports. Consistent with the PDA EIR and in compliance with PDA EIR **Mitigation Measure 3.4-1**, the proposed project would be required to prepare and submit a final geotechnical report and implement the report recommendations. The preliminary geotechnical report recommends that proposed structures be constructed in accordance with the provisions of the 2016 California Building Code or subsequent codes in effect when final design occurs. Implementation of PDA EIR **Mitigation Measure 3.4-1** and adherence to the California Building Code and applicable City building regulations would reduce impacts from strong seismic ground shaking to a less-than-significant level, consistent with the PDA EIR.

PDA EIR Impact 3.4a.iii. Seismic-related ground failure, including liquefaction? Less-than-Significant Impact with Mitigation Incorporated.

As discussed in impact 3.4a.ii above, projects within the PDA are required to submit site-specific geotechnical reports to address potential seismic-related ground shaking and ground failure, and unstable or expansive soil. Consistent with the PDA EIR and in compliance with PDA EIR **Mitigation Measure 3.4-1**, the proposed project would be required to prepare and submit a final geotechnical report and implement the report recommendations. The preliminary geotechnical report recommends that further investigation be performed to validate the liquefaction analyses as part of a design-level report. Further recommendations include using a rigid shallow foundation to account for potential settlement or utilizing deep foundations that extend through liquefiable materials. In addition, the geotechnical report also recommends flexible utility connections be provided to reduce the risk of

damage associated with potential liquefaction-induced ground movements. With implementation of PDA EIR **Mitigation Measure 3.4-1**, which requires compliance with site-specific geotechnical recommendations, potential impacts associated with seismic-related ground failure, including liquefaction remain less than significant.

PDA EIR Impact 3.4a.iv. Landslides? No Impact.

As concluded in the PDA EIR, the topography within and adjacent to the plan area, including the Station Avenue Project site, is nearly level. Thus, there would be no risk of loss, injury, or death involving landslides.

PDA EIR Impact 3.4b. Result in substantial soil erosion or the loss of topsoil? Less-than-Significant Impact with Mitigation Incorporated.

As noted in the PDA EIR, Plan area soils are moderately susceptible to erosion by wind and water. Plan area soils are of low permeability and have been classified as hydrologic group D (indicating a high stormwater runoff potential). Grading and construction activities would result in temporary soil disturbance and would expose disturbed areas to winter storm events. Therefore, as required by the PDA EIR, the project would prepare and implement site-specific SWPPPs and erosion control plans, per PDA EIR **Mitigation Measures 3.7-1** and **3.7-2**. In compliance with PDA EIR **Mitigation Measure 3.4-1**, the proposed project would be required to prepare and submit a final geotechnical report and implement the report recommendations. The preliminary geotechnical report prepared for the project recommends designing a site drainage system for the maximum credible rainfall event, and to collect surface water and discharge it into an established storm drainage system. Implementation of the aforementioned mitigation measures would ensure impacts related to soil erosion or the loss of topsoil are less than significant and consistent with the conclusions of the PDA EIR.

PDA EIR Impact 3.4c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? Less-than-Significant Impact with Mitigation Incorporated.

To address potential seismic-related ground shaking and ground failure, and unstable or expansive soil within the PDA, projects are required to submit project-specific geotechnical reports. In compliance with PDA EIR **Mitigation Measure 3.4-1**, the proposed project would be required to prepare and submit a final geotechnical report and implement the report recommendations. The preliminary geotechnical report recommends that a settlement analysis based on exploration, laboratory testing, and building loads be conducted, and that load balancing be implemented or deep foundations be used. Implementation of the recommendations included in the site-specific geotechnical reports, as required under PDA EIR **Mitigation Measure 3.4-1**, would reduce potential impacts related to geologic hazards to a less-than-significant level.

PDA EIR Impact 3.4d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property? Less-than-Significant Impact with Mitigation Incorporated.

To address potential seismic-related ground shaking and ground failure, and unstable or expansive soil within the PDA, projects are required to submit project-specific geotechnical reports. In compliance with PDA EIR **Mitigation Measure 3.4-1**, the proposed project would be required to prepare and submit a final geotechnical report and implement the report recommendations. The preliminary geotechnical

recommends that soils under building pads consist of at least 36 inches of non-expansive soils or existing soils should be treated within lime-cement to reduce expansion potential. The report also recommends that soils be moisture conditioned to slightly above the optimum moisture content during site grading and maintained at this moisture content until important aggregate base and/or surface flatwork is completed. Implementation of the recommendations included in the site-specific geotechnical reports, as required under PDA EIR **Mitigation Measure 3.4-2**, would reduce potential impacts related to expansive soils to a less-than-significant level.

PDA EIR Impact 3.4e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? No Impact.

Portable toilets would be used during construction and hook-ups to public sewers would be incorporated into the project. As concluded in the PDA EIR, no impacts related to septic tanks would occur.

Cumulative Impacts

The PDA EIR concluded that "implementation of the proposed plan, when considered with the related projects, would not create additional facilities under increased risk of geologic hazards" or soil erosion. Impacts associated with the Station Avenue Project are consistent with the PDA Plan and the applicable PDA EIR mitigation measure would be implemented. Accordingly, the project would not significantly contribute to associated cumulative impacts, consistent with the PDA EIR.

Mitigation Measures

The PDA EIR mitigation measures for Geology and Soils that are applicable to the Station Avenue Project are summarized below. The entire measures can be found in the Station Avenue MMRP in Appendix H.

- 3.4-1 Prepare, Submit, and Implement Site-Specific Geotechnical Reports.

GREENHOUSE GAS EMISSIONS

Impacts associated with implementation of the PDA Plan were analyzed on a program-level basis in the PDA EIR. For purposes of the proposed project, an air quality and greenhouse gas (GHG) emissions assessment (Dudek 2018a) was prepared to estimate criteria air pollutant and GHG emissions from construction and operation of the project. This report, which was referenced to complete this section of the consistency analysis, is provided with this document as Appendix A.

Climate change refers to any significant change in measures of climate, such as temperature, precipitation, or wind, lasting for an extended period (decades or longer). Gases that trap heat in the atmosphere are often called GHGs. Principal GHGs include carbon dioxide (CO2), methane (CH4), nitrous oxide, O3, and water vapor. Some GHGs, such as CO2, CH4, and nitrous oxide, occur naturally and are emitted to the atmosphere through natural processes and human activities. Of these gases, CO2 and CH4 are emitted in the greatest quantities from human activities.

Consistency Analysis of Impacts & Mitigation Measures

The impact discussion below follows the discussion in the PDA EIR.

PDA EIR Impact 3.5a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? Less-than-Significant Impact with Mitigation Incorporated.

While noting that the amount of GHG emissions generated would vary from day to day, depending on the types of construction activities, the PDA EIR found that the annual amortized construction emissions from PDA buildout would be approximately 4,949 metric tons of carbon dioxide equivalent per year (MT CO_2e/yr). The operational emissions would total approximately 39,672 MT CO_2e/yr. According to the PDA EIR, the Plan's construction and operational GHG emissions would exceed BAAQMD's thresholds of significance. The threshold for stationary sources is 10,000 MT CO2e per year (i.e., emissions above this level may be considered significant). For nonstationary sources, the following three separate thresholds have been established:

- Compliance with a Qualified Greenhouse Gas Reduction Strategy (i.e., if a project is found to be out of compliance with a Qualified Greenhouse Gas Reduction Strategy, its GHG emissions may be considered significant).
- 1,100 MT CO2e per year (i.e., emissions above this level may be considered significant).
- 4.6 MT CO2e per service population per year (i.e., emissions above this level may be considered significant). (Service population is the sum of residents plus employees expected for a development project.)

To mitigate potential impacts associated with GHG emissions resulting from buildout of the PDA Plan, the PDA EIR includes **Mitigation Measures 3.5-1** through **3.5-3**. PDA EIR **Mitigation Measure 3.5-1** requires project-level CEQA analyses to assess GHG emission impacts related to construction and PDA EIR **Mitigation Measure 3.5-3** requires project-level CEQA analyses to assess GHG emission impacts related to operations. Both measures state that potentially significant GHG impacts shall be mitigated to a less-than-significant level via alteration of project details. PDA EIR **Mitigation Measure 3.5-2** includes the requirement to purchase carbon offsets if construction or operational emissions are determined to continue to exceed BAAQMD's GHG threshold following implementation of PDA EIR **Mitigation Measure 3.5-1** and **3.5-3**, if necessary.

The PDA EIR concluded that, with implementation of PDA EIR **Mitigation Measures 3.5-2** and **3.5-3**, construction and operational GHG emissions associated with each individual component of the PDA Plan would be reduced to a less-than-significant level. Therefore, assessment of individual project impacts within the Plan area and implementation of necessary mitigation and offsets would reduce impacts to a less-than-significant level.

In compliance with PDA EIR **Mitigation Measure 3.5-1** and **3.5-3**, a project-specific air quality and GHG emissions assessment has been prepared. This analysis concludes that, construction of the project would result in GHG emissions, which are primarily associated with use of off-road construction equipment, on-road vendor (material delivery) trucks, and worker vehicles. Since the BAAQMD has not established construction-phase GHG thresholds, construction GHG emissions were amortized assuming a 30-year development life after completion of construction and added to operational emissions to compare to the BAAQMD operational GHG threshold. Amortized GHG emissions associated with project construction would result in annualized generation of 94.37 MT CO2e.

The assessment further notes that long-term operational emissions would occur over the life of the project, with the first full year of operations in year 2021. CalEEMod was used to estimate GHG emissions from motor vehicle trips, grid electricity usage, solid waste, and other sources (including area sources and water/wastewater conveyance). The assessment concludes that GHG emissions associated with the project (4.36 MT CO2e per service population per year) would not exceed the BAAQMD's GHG threshold of 4.6 MT CO2e per service population per year. Therefore, the project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment and this would represent a cumulatively less than significant GHG impact.

PDA EIR Impact 3.5b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? Less-than-Significant Impact.

As discussed in the PDA EIR, the proposed PDA Plan would not conflict with any plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Since the project would be consistent with the PDA Plan and would result in GHG emissions below the BAAQMD thresholds (as described above), the project also would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Cumulative Impacts

By implementing the features and mitigation measures described above to ensure the project's impacts related to GHG emissions would be less than significant, the project would not contribute to significant cumulative impacts associated with GHG emissions.

Mitigation Measures

The PDA EIR mitigation measures for Green House Gases that are applicable to the Station Avenue Project are summarized below. The entire measures can be found in the Station Avenue MMRP in Appendix H.

- 3.5-1 Assess GHG Emissions Associated with Project-Specific Construction and Alter Project Details and/or Construction Equipment as Needed.
- 3.5-3 Assess GHG Emissions Associated with Project-Specific Operations and Alter Project Details as Needed.

HAZARDS AND HAZARDOUS MATERIALS

Impacts associated with implementation of the PDA Plan were analyzed on a program-level basis in the PDA EIR. For purposes of the proposed project, a Phase I Environmental Site Assessment (ESA) (Partner Engineering and Science, Inc., 2017) was prepared for the project site in accordance with the American Society for Testing and Materials (ASTM) Standard Practice E1527-13. The Phase I ESA provides an assessment concerning environmental conditions (limited to those issues identified in the report) as they exist at the subject property. This assessment was used to complete this section of the consistency analysis and is included as Appendix E. In addition, State Water Resources Control Board GeoTracker was used to provide data on the City Corp Yard as discussed below.

Consistency Analysis of Impacts & Mitigation Measures

The impact discussion below follows the discussion in the PDA EIR.

PDA EIR Impacts 3.6a and 3.6b. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? Less-than-Significant Impact.

As discussed in the PDA EIR, all project construction and operation within the PDA Plan area would be required by law to comply with applicable federal, state, and local hazardous material regulations. These regulations are specifically designed to protect the public health through improved procedures for the handling of hazardous materials, better technology in the equipment used to transport these materials, and a more coordinated, quicker response to emergencies. Therefore, and as concluded in the PDA EIR, impacts related to the creation of significant hazards to the public through routine transport, use, disposal, and risk of upset during project construction and operations would be less than significant.

PDA EIR Impact 3.6c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? Less-than-Significant Impact.

The nearest school to the project site is John Reed Elementary School, located approximately 0.24 mile southwest of the project site. Construction and operation of the project would not result in the handling or emission of substances classified as extremely hazardous within one-quarter mile of a school. As noted in the PDA EIR, the Plan area is already developed with commercial, light industrial, civic, and multifamily residential land uses, and these types of land uses would continue under the Plan; therefore, implementation of the Plan would not subject existing school children or school employees to new hazardous substances, or hazardous substances at locations that are any closer than the current distances. Although small quantities of hazardous materials such as fuels, oils, and lubricants would be used in construction equipment, none of these materials are classified as acutely hazardous. Construction contractors and existing and future business operators are required to use, store, and transport hazardous materials in compliance with federal, state, and local regulations. The use of these materials during construction and operation would not represent a safety hazard for persons who would attend or be employed in either the on-site or off-site schools. Therefore, this impact would be less than significant and consistent with the PDA EIR.

PDA EIR Impact 3.6d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? Less-than-Significant Impact with Mitigation Incorporated.

The project site was historically used for agricultural purposes. There is a potential that agricultural related chemicals such as pesticides, herbicides, and fertilizers, may have been used and stored on-site in the past. However, because the project site is largely paved, covered by building structures, and soils were generally mixed or covered with fill material, possible former use of agricultural chemicals is not expected to represent a significant environmental concern at this time.

According to the Phase I ESA, the site was identified as a UST, HIST UST, SWEEPS UST, CA FID UST, CUPA Listings, EMI, FINDS, ECHO, RCRA-NonGen/NLR, and HAZNET site. The project site is listed on various Underground Storage Tank (UST) databases due to the former presence of diesel and gasoline USTs on-site. Impacted soil and pea gravel was removed from the site. The Sonoma County Environmental Health Department subsequently issued a closure letter regarding the former USTs on August 9, 1994. Soil vapor levels were determined to be below DTSC screening levels, and no further investigation was

recommended. As such, the former USTs are considered an historical recognized environmental condition (HREC). Following the removal of the former diesel and gasoline USTs from the site, the product pipeline from the diesel UST to the boiler room was capped and left in place. The former presence of the fuel tanks has been issued case closure by the local regulatory agency. However, the Phase I ESA recommended that the pipeline be exposed and be properly disposed of during redevelopment. Furthermore, additional soil samples from beneath the pipeline may need to be collected to rule out any release/subsurface impact. In addition, according to a prior Phase I ESA from 2012, two manhole covers were observed within the former estimation and machining room. It is recommended that during redevelopment, the manhole covers be opened and inspected to rule out the presence of a sub-grade feature such as an oil/water clarifier. If such a feature was to be discovered, it may be necessary to remove the feature and collect soil samples from beneath the feature to rule out any release/subsurface impact. These recommendations would be included with project construction.

The subject property is also listed as a HAZNET site due to the generation of hazardous waste in the form of laboratory waste chemicals, other inorganic solid waste, photo-chemicals/photoprocessing waste, and asbestos containing waste. The CUPA Listings identification is due to the current presence of a diesel Aboveground Storage Tank on-site. The EMI listing refers to the presence of an emergency generator on-site. No violations or release incidents were reported in association with these listings. Based on the lack of a reported release, and the current regulatory status, these listings do not represent a significant environmental concern.

As noted in the PDA EIR, the soil and the groundwater at the Corporation Yard, which is within the proposed Station Avenue site, were contaminated with petroleum hydrocarbons from two leaking USTs that were removed in 1990, along with approximately 1,500 cubic yards of contaminated soil. Residual soil contamination is still present at the site approximately 10 to 22 feet below ground surface. The EIR noted that a high-vacuum, dual-phase extraction system would be utilized for site remediation. The EIR concluded that future redevelopment of this site could expose construction workers and future site-specific business employees and the general public to adverse health effects from contaminated soil and/or groundwater, including indoor air quality effects from vapor intrusion, which would be a potentially significant impact.

The PDA EIR also notes that some of the existing structures within the Plan area may contain asbestos and lead-based paint. During redevelopment within the Plan area, the EIR concluded that construction workers and future site-specific business employees and the general public could be exposed to adverse health effects from asbestos and lead-based paint, a potentially significant impact.

To reduce impacts related to soil and groundwater contamination at the Corporation Yard, the project would be required to implement PDA EIR **Mitigation Measure 3.6-1**, which requires consultation with Sonoma County and the North Coast Regional Water Quality Control Board prior to development. This measure requires the applicant to conduct any applicable tests that may be required by the North Coast RWQCB prior to development, such as vapor intrusion studies related to indoor air quality or soil or groundwater testing. In addition to PDA EIR Mitigation Measure 3.6-1, the project would be required to implement PDA EIR **Mitigation Measure 3.6-2**, which requires removal of asbestos-containing material and lead-based paint in accordance with Federal, State, and local regulations. Implementation of these measures would ensure that impacts associated with hazardous materials remain less than significant and consistent with the PDA EIR.

PDA EIR Impacts 3.6e and 3.6f. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project

result in a safety hazard for people residing or working in the project area? For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? No Impact.

As the project is not located within 2 miles of an active airport, no airport-related impacts would occur.

PDA EIR Impact 3.6g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? Less-than-Significant Impact with Mitigation Incorporated.

The project would prepare and implement a project-specific construction traffic control plan, per PDA EIR **Mitigation Measure 3.6-3**. As discussed in the PDA EIR, preparation and implementation of a construction traffic control plan would ensure adequate emergency access during construction and would serve to reduce impacts associated with decreased emergency response times. As stipulated in PDA EIR **Mitigation Measure 3.6-3**, the traffic control plan could include measures related to advertising of planned lane closures, warning signage, a flag person to direct traffic flows when needed, and methods to ensure continued access by emergency vehicles. The Mitigation Measure also requires that the traffic control plan be submitted to the City for review and approval. With implementation of EIR **Mitigation Measure 3.6-3**, impacts associated with emergency response and evacuation would remain less than significant, as concluded in the PDA EIR.

PDA EIR Impact 3.6h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? Less-than-Significant Impact.

As an already developed area, the project is not in or near an area of high fire hazard severity, as discussed in the PDA EIR. This impact would be considered less than significant, consistent with the PDA EIR.

Cumulative Impacts

With compliance to applicable federal, state, and local hazardous material regulations, and implementation of PDA EIR **Mitigation Measure 3.6-3**, the project would not significantly contribute to cumulative impacts, consistent with the PDA EIR.

Mitigation Measures

The PDA EIR mitigation measures for Hazards and Hazardous Materials that are applicable to the Station Avenue Project are summarized below. The entire measures can be found in the Station Avenue MMRP in Appendix H.

- 3.6-1 Consult with RWQCB and Sonoma County Prior to Development at Known Contamination Sites and Implement consultation Recommendations.
- 3.6-2 Remove Project-Specific Asbestos-Containing Material and Lead-Based Paint in Accordance with Federal, State, and Local Regulations .
- 3.6-3 Prepare and Implement Project-Specific Construction Traffic Control Plans.

HYDROLOGY AND WATER QUALITY

Impacts associated with implementation of the PDA Plan were analyzed on a program-level basis in the PDA EIR.

Consistency Analysis of Impacts & Mitigation Measures

The impact discussion below follows the discussion in the PDA EIR.

PDA EIR Impacts 3.7a and 3.7f. Violate any water quality standards or waste discharge requirements? Otherwise substantially degrade water quality? Less-than-Significant Impact with Mitigation Incorporated.

The project would prepare and implement site-specific SWPPPs and erosion control plans during construction, per PDA EIR **Mitigation Measures 3.7-1** and **3.7-2**, to reduce impacts related to water quality standards or waste discharge requirements. Compliance with the National Pollution Discharge Elimination System (NPDES) municipal separate storm sewer system (MS4) stormwater permit requirements would reduce operation-related impacts, consistent with the PDA EIR.

PDA EIR Impact 3.7b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? Less-than-Significant Impact with Mitigation Incorporated.

If dewatering is required during construction because of the possible presence of a shallow water table at the site, the project would prepare and implement site-specific provisions for dewatering, per PDA EIR **Mitigation Measure 3.7-3.** According to the geotechnical report prepared for the proposed Station Avenue Project (Miller Pacific Engineering Group, 2018), at the site, the groundwater table was estimated to be between 7 and 14 feet below the ground surface. The report recommends that groundwater be anticipated at 5 feet below existing ground surface for preliminary design. Implementation of PDA EIR **Mitigation Measure 3.7 3**, together with adherence to state and local regulatory requirements as part of the NPDES permit requirements, would reduce the potential water quality impact from dewatering to a less-than-significant level, as concluded in the PDA EIR.

PDA EIR Impact 3.7c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site? Less-than-Significant Impact with Mitigation Incorporated.

And

PDA EIR Impacts 3.7d and 3.7e. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site? Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? Less-than-Significant Impact with Mitigation Incorporated.

To avoid substantially altering the site's drainage pattern during construction and operation of the project, the project would prepare and implement site-specific SWPPPs and erosion control plans, per PDA EIR **Mitigation Measures 3.7-1** and **3.7-2**. Drainage from the project site would include connections to the City's existing storm drain system as well as a series of storage zones, bio-retention features, permeable parking lot pavement and underground storage facilities to treat stormwater before discharging into the City's system. Plans submitted prior to project grading would analyze the need for on-site detention for any potential increase in post-construction over pre-construction flows for flows in excess of the LID treatment storm. Consistent with the PDA EIR conclusions, no net increase in stormwater runoff would occur.

PDA EIR Impact 3.7g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? No Impact.

And

PDA EIR Impact 3.7h. Place within a 100-year flood hazard area structures that would impede or redirect flood flows? No Impact.

And

PDA EIR Impact 3.7i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? No Impact.

As noted in the PDA EIR, there are no 100-year flood zones in the Plan area. The project site, within the Plan area, is also not located within a 100-year flood zone. The plan area is not located in an area that is protected by levees. There are no reservoirs located in the plan area and the plan area is located outside of a dam inundation area, as described in the City of Rohnert Park's draft Local Hazard Mitigation Plan (PDA EIR citing ABAG 2011). As concluded in the PDA EIR, project implementation would result in no impacts associated with flood-related hazards.

PDA EIR Impact 3.7j. Inundation by seiche, tsunami, or mudflow? Less-than-Significant Impact.

The project site is not located within a 100-year flood zone, or within close distance of the Pacific Ocean to incur a tsunami or seiche. As the project site's terrain is relatively flat, mudslide risks are less than significant, as concluded in the PDA EIR.

Cumulative Impacts

Compliance with the PDA EIR mitigation measures regarding site-specific SWPPP, erosion control plan, and dewatering mitigation would ensure the project does not significantly contribute to cumulative impacts related to hydrology.

Mitigation Measures

The PDA EIR mitigation measures for Hydrology and Water Quality that are applicable to the Station Avenue Project are summarized below. The entire measures can be found in the Station Avenue MMRP in Appendix H.

- 3.7-1 Prepare and Implement Site-Specific SWPPPs.

- 3.7-2 Prepare, Submit, and Implement Site-Specific Erosion Control Plans.
- 3.7-3 Prepare and Implement Site-Specific Provisions for Dewatering.

NOISE

Impacts associated with implementation of the PDA Plan were analyzed on a program-level basis in the PDA EIR. For purposes of the proposed project, a project-level noise analysis was prepared to examine the development as compared to the concept in the PDA EIR, including noise exposure for sensitive land uses, the potential for changes to project-related traffic noise levels, and changes to ambient noise levels in the project area since 2016. This report was used to complete this section of the consistency analysis and is included as Appendix F.

Most noise-sensitive uses (i.e., residential) near the plan area are located east of the existing railroad tracks to be used by Sonoma-Marin Area Rail Transit (SMART), and to the south along and south of Enterprise Drive. Existing noise sources affecting the noise environment in the project area include vehicle traffic from the SMART station, SMART station train operations, traffic on Rohnert Park Expressway, traffic along other roads adjacent to the project site, noise from commercial land uses west of the site, and the City of Rohnert Park Corporation Yard.

Chapter 17.12 of the Rohnert Park Code of Ordinances includes performance standards applicable to noise generated by an individual property (i.e. residences, commercial businesses, or industrial plants). No uses or activities shall create noise levels exceeding 60 dBA for more than 5 minutes in any hour for residential zones during daytime. The limit is 65 dBA for mixed use, public/institutional, and open space zones. Between the hours of 7:00 p.m. and 7:00 a.m. the limit is reduced to 50 dBA or the ambient noise level for all zones.

Consistency Analysis of Impacts & Mitigation Measures

The impact discussion below follows the discussion in the PDA EIR.

PDA EIR Impact 3.8a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? Less-than-Significant Impact with Mitigation Incorporated.

The project prepared a site-specific exterior acoustical analysis, as summarized below, and would implement report recommendations, per PDA EIR **Mitigation Measures 3.8-1 and 3.8-2**.

Construction Noise

According to the Station Avenue Noise Analysis, no significant changes in construction activities are proposed in comparison to the assumptions used for PDA EIR analysis. A temporary increase in the existing ambient noise levels near the construction site, including at existing residential uses in the site vicinity, would still be expected. Construction activities would still be required to comply with the City's allowable hours (i.e., only during the hours between 8:00 a.m. and 6:00 p.m.) as described in the PDA EIR, and construction activities would remain temporary. Construction deliveries are also expected to occur within these limited hours. Construction-related noise impacts would remain less than significant, consistent with the PDA EIR.

Operational Noise

Commercial Uses

The project would include commercial uses located adjacent to residential uses which could result in noise impacts on the residences. Commercial delivery schedules are expected to have limited hours (per the project applicant) that would be included as part of the project and as a condition of the leasing language which would eliminate the most common noise conflicts between adjacent commercial uses and residential receivers.

Mechanical equipment is expected to be the primary stationary noise source. Those condensing unit clusters would be expected to be placed on the rooftops as was assumed in the PDA EIR. Sound levels resulting from continuous simultaneous operation of all of the proposed stationary equipment would be less than 58 dBA equivalent sound level (Leq), which would be considered less than significant and consistent with the PDA EIR. Noise impacts from proposed commercial uses adjacent to on-site residential uses are therefore considered to be less than significant and consistent with the PDA EIR.

Stage in the Urban Core

A temporary stage would occasionally be used in the urban core area of the project. Use of the stage would require approval of an "event" use permit by the City. Event use permits contain schedule restrictions and other limitations to avoid significant nuisance noise impacts from such events. Accordingly, operational noise from events involving the stage are expected to comply with the City's Noise Ordinance.

Traffic Noise

The traffic noise model was based on data from the Traffic Impact Assessment (W-Trans 2018). This modeling at specific receiver locations on and off site accounted for the changes in traffic on all of the vicinity roadways with data provided in the recent traffic impact assessment.

Off-site Land Uses

As noted in the noise analysis for the proposed project, all modeled receivers in the vicinity of the site would experience less than a 1 dB increase in traffic noise levels due to the project. This change would be below significance thresholds. Therefore, off-site traffic noise impacts associated with the proposed project would be less than significant and consistent with the PDA EIR.

The noise analysis also compared the future traffic noise scenario of all approved projects with all approved projects plus the proposed project to assess the potential significance of project impacts. All modeled receivers in the vicinity of the site would experience less than a 1 dB increase in future traffic noise levels due to the project. No off-site receivers would experience an increase in traffic noise levels exceeding noise significance thresholds. Future off-site traffic noise impacts associated with all Approved Projects plus the Proposed Project scenario would be less than significant consistent with the analysis in the PDA EIR.

On-Site Roadway Traffic Noise

Calculated traffic noise results based on the updated traffic study volumes are lower than the results contained in the PDA EIR. The lower results are generally due to increased separation distances between roadways and building locations than was assumed in the PDA EIR. The PDA EIR assumed buildings might be located as close as 100 feet from the centerline of Rohnert Park Expressway. The proposed Station

Avenue site plan indicates the closest building to this road would be approximately 125 feet from the centerline. Other proposed residences along Rohnert Park Expressway are also set back further than anticipated when the PDA EIR analysis was prepared.

The noise analysis concludes that all of the residential locations on the site have modeled future traffic noise levels below 60 dBA CNEL and the on-site residential traffic noise impacts would be less than significant. With a calculated future exterior noise exposure level at the proposed hotel location less than 65 dBA CNEL in compliance with the Mixed Use noise standard, traffic noise impacts at the future hotel site are considered to be less than significant, consistent with the PDA EIR.

This additional distance from the roads is the main factor resulting in the lower than expected traffic noise levels at the proposed on-site noise sensitive receptors.

PDA EIR Impact 3.8b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? Less-than-Significant Impact.

The PDA EIR found that Plan area residents would not be exposed to excessive groundborne vibration or groundborne noise levels provided that residential development is located greater than 25 feet from SMART rail tracks. Therefore, vibration impacts from the SMART operation on the proposed project would be less than significant. Project construction activities would occur in accordance with the City's allowable construction hours and construction-related vibration impacts would be less than significant, consistent with the PDA EIR. Furthermore, operational vibration would also be less than significant since no equipment capable of producing large vibration is planned for the proposed project.

PDA EIR Impact 3.8c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? Less-than-Significant Impact.

The project would not create permanent noise sources other than the types evaluated in the PDA EIR. Operation of the project would contribute to the mechanical equipment noise levels anticipated under the PDA EIR and would not substantially permanently increase ambient noise levels in the vicinity. Calculated traffic noise results for the proposed project are less than the results contained in the PDA EIR.

PDA EIR Impact 3.8d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? Less-than-Significant Impact with Mitigation Incorporated.

The PDA EIR found that construction activities associated with the PDA plan would temporarily increase the ambient noise in the vicinity of the plan area. The project would be required to comply with the performance standards set forth in PDA EIR **Mitigation Measure 3.8-3** to reduce the environmental effects of construction noise to a less-than-significant level.

PDA EIR Impact 3.8e. For a project located within an airport land use plan, or where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? No Impact.

And

PDA EIR Impact 3.8f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? No Impact.

Because the project is not within close proximity to an active airport or airstrip, the project would not expose residents to excessive airplane-related noise levels, as concluded in the PDA EIR.

Cumulative Impacts

While construction of multiple projects within the City could create temporary cumulative impacts, the project would reduce its contribution to those potential environmental effects to a less-than-significant level with implementation of PDA EIR **Mitigation Measure 3.8-3** which restricts the construction activity timing and the location and specifications for construction equipment. The distance between project sites within the City would ensure that no cumulative impacts related to groundborne vibration occur. The project would generate off-site traffic volumes that are consistent with the assumptions in the PDA EIR, which found that traffic noise levels would not increase substantially in the cumulative condition, and therefore cumulative traffic noise impacts would remain less than significant.

Mitigation Measures

The PDA EIR mitigation measures for Noise that are applicable to the Station Avenue Project are summarized below. The entire measures can be found in the Station Avenue MMRP in Appendix H.

- 3.8-1 Prepare Site-Specific Interior Acoustical Analysis Reports for Residential Projects and Implement Report Recommendations.
- 3.8-2 Prepare Site-Specific Exterior Acoustical Analysis Reports for Residential Projects and Implement Report Recommendations.
- 3.8-3 Restrict Construction Activity Timing and Construction Equipment Specifications and Location.

TRANSPORTATION-TRAFFIC

Impacts associated with implementation of the PDA Plan were analyzed on a program-level basis in the PDA EIR. For purposes of the proposed project, an updated, project-level study (W-Trans 2018) to analyze whether potential impacts associated with development would be consistent with the PDA EIR. This report is included as Appendix G of this consistency analysis.

The project specific traffic analysis focused on the streets and intersections surrounding the project site and includes the following intersections:

1. Rohnert Park Expressway/State Farm Drive
2. Rohnert Park Expressway/Lynne Conde Way-Quest Street
3. Rohnert Park Expressway/Grand Street
4. State Farm Drive/Venture Avenue
5. State Farm Drive/Station Avenue
6. State Farm Drive/Spirit Avenue
7. State Farm Drive/Enterprise Drive
8. Enterprise Drive/Quest Street
9. Enterprise Drive/Grand Street
10. Enterprise Drive/Seed Farm Drive

Operating conditions during the a.m. and p.m. peak periods were evaluated to capture the highest potential impacts for the proposed project as well as the highest volumes on the local transportation network.

The study intersections were analyzed using methodologies published in the Highway Capacity Manual (HCM), Transportation Research Board, 2010. The Levels of Service for the intersections with side street stop controls, or those which are unsignalized and have one or two approaches stop-controlled, were analyzed using the "Two-Way Stop-Controlled" intersection capacity method from the HCM. This methodology determines a level of service for each minor turning movement by estimating the level of average delay in seconds per vehicle. Results are presented for individual movements together with the weighted overall average delay for the intersection.

State Farm Drive/Enterprise Drive was analyzed using the "All-Way Stop-Controlled" Intersection methodology from the HCM for all plus Project scenarios. This methodology evaluates delay for each approach based on turning movements, opposing and conflicting traffic volumes, and the number of lanes. Average vehicle delay is computed for the intersection overall, which is then related to a Level of Service.

Rohnert Park Expressway/State Farm Drive was evaluated using the "Signalized" methodology from the HCM. This methodology is based on factors including traffic volumes, green time for each movement, phasing, whether the signals are coordinated or not, truck traffic, and pedestrian activity. Average stopped delay per vehicle in seconds is used as the basis for evaluation in this LOS methodology. Changes to the signal timing and coordination on Rohnert Park Expressway were implemented in May 2018, and are reflected in the calculations.

Consistency Analysis of Impacts & Mitigation Measures

The impact discussion below follows the discussion in the PDA EIR.

PDA EIR Impact 3.9a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and nonmotorized travel and relevant components of the circulation system, including but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? Significant and Unavoidable Impact.

The Traffic Impact Study (Appendix G) found that the project would generate 7,368 new daily traffic trips, with 405 trips in the AM peak hour and 620 trips in the PM peak hour. The traffic study evaluated the effects of the project on ten nearby intersections, concluding that the addition of project-related traffic to existing volumes would result in unacceptable conditions at one of these intersections, and acceptable conditions at the other nine. The intersection at State Farm Drive/Venture Avenue is projected to operate unacceptably at LOS F during the p.m. peak hour with project traffic. The intersection at Rohnert Park Expressway/State Farm Drive is expected to drop from LOS C to LOS D during the a.m. peak hour, and continue operating at LOS D during the p.m. peak hour. However, LOS D operation is considered acceptable at this location, per Policy C-1.2 of the Central Rohnert Park PDA Plan. A traffic signal would be installed at the intersection of State Farm Drive/Venture Avenue, consistent with the recommendations in the PDA EIR.

The traffic analysis prepared for the PDA Plan EIR assumed a total of 10,393 daily trips for the Station Center district, including 526 AM peak hour trips and 693 PM peak hour trips. These projections, which

were used in the PDA EIR, exceed the anticipated trip generation resulting from the proposed project. The long-range cumulative traffic impacts identified in the PDA EIR would therefore adequately reflect, if not slightly overstate, the traffic impacts resulting from implementation of the proposed project along with cumulative development in the City and region.

The Traffic Impact Study also considered non-auto modes of transportation and noted that the Station Avenue site is well-served by pedestrian, bicycle and transit facilities. Improvements to enhance connections to surrounding offsite facilities were included in the PDA EIR or have been included as part of the Station Avenue Project. These include the installation of a traffic signal or pedestrian hybrid beacon at the Rohnert Park Expressway/Lynne Conde Way-Quest Street intersection, an active pedestrian warning system such as a rapid rectangular flashing beacon at the State Farm Drive/Station Avenue intersection, and a raised pedestrian island with new crosswalk at the Enterprise Drive/Quest Street intersection. Modification of the cycle track along the project's frontage of State Farm Drive between Discovery Street and Rohnert Park Expressway to include a landscaped buffer between the cycle track and roadway curb was also included. The analysis also concluded that the project would be well-served by both bus and rail transit services, and with the pedestrian enhancements, as noted above, would provide effective connections to transit. The project would create a new pedestrian linkage to the Rohnert Park SMART commuter rail station, creating a direct access for the project's residents, employees, and visitors, and also improving accessibility to the station from surrounding areas in Central Rohnert Park. The project's internal grid of streets, as well as its proposed connection of the Rohnert Park Expressway eastbound slip street to the SMART station's parking lot, also creates the potential for transit agencies to adapt bus routes over time to more directly serve SMART station users as well as users generated by the proposed project. The Traffic Impact Study concluded impacts associated with non-auto modes of transportation would be less than significant, consistent with the PDA EIR.

PDA EIR Impact 3.9b. Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? Less-than-Significant Impact.

And

PDA EIR Impact 3.9c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? No Impact.

And

PDA EIR Impact 3.9d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e. g. farm equipment)? No Impact.

And

PDA EIR Impact 3.9e. Result in inadequate emergency access? Less-than-Significant Impact.

The project would not conflict with an applicable congestion management program, would not result in a change in air patterns, would not result in an increase in hazards due to design features, and would not result in inadequate emergency access, consistent with the PDA EIR.

PDA EIR Impact 3.9f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? Less-than-Significant Impact.

Consistent with goals of the PDA Plan, the project would accommodate and encourage the use of public transit and bicycle and pedestrian travel by being located within walking and biking distance to shopping, grocery stores, public transportation including the planned SMART train station, dining and Sonoma State University. A new traffic signal would be added to intersection of State Farm Drive with the northerly street connection. Also, a pedestrian crosswalk would be added on Rohnert Park Expressway at the westerly street connection to provide access to the Civic Center on the north side of the street. Class II bike lanes are proposed along the south side of Rohnert Park Expressway, along the north side of Enterprise Drive, and along internal roadways such as Grant Street, Abbey Road, Spirit Avenue, and Penny Lane. A Class IV bike path (one way northbound) would be provided along the east side of State Farm Drive.

The project's street system would encourage low vehicle speeds which would allow for safe bicycle traffic on the internal project streets. Sidewalks are proposed along all roadways throughout the project site. As concluded in the PDA EIR, the proposed project would not result in conflicts with policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities.

Cumulative Impacts

The project site is represented as the "Station Center" district in the Central Rohnert Park PDA Plan. The traffic analysis prepared for the PDA EIR, Traffic Impact Study for the Central Rohnert Park PDA Plan, assumed a total of 10,393 daily trips for the Station Center district, including 526 a.m. peak hour trips and 693 p.m. peak hour trips. These projections, which were used in the PDA EIR, exceed the anticipated trip generation resulting from the proposed project. The long-range cumulative traffic impacts identified in the PDA Plan EIR would therefore adequately reflect, if not slightly overstate, the traffic impacts resulting from implementation of the project along with cumulative development in the City and region.

Mitigation Measures

No mitigation measures are included in the PDA EIR for Traffic impacts. All impacts were found to be less than significant, except for worsening conditions on State Highway 101. Mitigation for this impact was considered infeasible as the City has no control over state highway facilities. The City Council adopted a Statement of Overriding Considerations when certifying the PDA EIR. The proposed project is consistent with the traffic findings of the PDA EIR.

OTHER CEQA CONSIDERATIONS

Significant Environmental Effects Which Cannot be Avoided if the Project is Implemented

The PDA EIR identified a significant and unavoidable impact from implementation of the PDA Plan. That impact was related to the level of service along U.S. 101, concluding that the proposed plan along with cumulative development in the City would result in a worsened level of service in the a.m. and p.m. peak hours north of the plan area. This impact would remain significant and unavoidable with implementation of the proposed project, but as described in the Traffic Impact Study (Appendix G) the

project would not increase the severity of that impact. This impact was considered prior to adoption of the PDA Plan and the City Council adopted a Statement of Overriding Considerations.

Significant Irreversible Environmental Changes

CEQA and the State CEQA Guidelines (Section 151826[c]) require that significant irreversible environmental changes be identified in an EIR. The PDA EIR concluded that projects within the PDA Plan would involve the use of nonrenewable resources during the construction phase, such as petroleum-based products and metals that cannot reasonably be recreated and would involve significant consumption of energy, usually petroleum-based fuels that deplete supplies of nonrenewable resources. However, because of its temporary and one-time nature, construction under the proposed plan would not represent a significant irreversible use of resources.

Further, the EIR concluded that land uses associated with the proposed plan would use some nonrenewable fuels to heat and light structures and consume water but that development projects would be built to current codes, including green building standards which support designs that minimize wasteful energy consumption. These projects would be as energy efficient as possible and would be located in an area that is served by public transportation, including bus service and the Sonoma-Marin Area Rail Transit commuter rail service. The land uses within the proposed plan would consume less energy and water than the existing land uses in the plan area and would represent a decreased use in resources, and thus would not represent a significant irreversible use of resources. These conclusions are applicable to the proposed project.

Growth-Inducing Impacts

Growth-inducing impacts are generally categorized as direct or indirect. Direct growth-inducing impacts are associated with providing urban services to an undeveloped area. Indirect, or secondary growth-inducing impacts consist of growth induced in the region by additional demands for housing, goods, and services associated with population increase caused by or attracted to, a new project.

The Station Avenue Project proposes to construct 460 residential units. The PDA land use designation for the site would allow for 415 multi-family residential units. The increase in residential density at the site would incrementally increase population growth within the site and induce growth elsewhere in the City. However, this incremental increase would not substantially alter or increase the severity of impacts evaluated in the PDA EIR. The PDA EIR found that implementation of the PDA Plan could include the construction of up to 835 residential units, which would increase the population of the Plan area and the City by 1,670 residents by 2040. Specifically, the PDA EIR assumed development of 150 units in the Triangle Business Area, 115 units in the City Center area, 415 units in the Station Center area, and 155 units in the Creekside Neighborhood area. Thus, with implementation of the proposed project, there would be 45 more units than planned for in the PDA for the Station Center subarea. However, the overall PDA Plan area has sufficient lands use to accommodate the additional units. As discussed in the Population and Housing section below, in the adjacent plan subarea after approval of all residential uses additional residential capacity is available to accommodate the units proposed at Station Avenue. Accordingly, the residential population increase associated with the proposed project would be consistent with projected in the PDA EIR.

The project also includes retail, office and other commercial uses that would generate employment growth, other than construction jobs. The Mixed Use land uses proposed are consistent with the analysis in the PDA EIR which concluded this level of indirect growth would be consistent with ABAG's

projection for Rohnert Park by 2020.The Station Avenue Project would contribute to the significant and unavoidable impacts related to growth inducement associated with the PDA Plan, consistent with the analysis in the PDA EIR. This impact was considered prior to adoption of the PDA Plan and the City Council adopted a Statement of Overriding Considerations.

EFFECTS FOUND NOT TO BE SIGNIFICANT

The PDA EIR determined that the PDA Plan would not have the potential to cause significant impacts associated with eight resource topics. Chapter 5.0 "Effects Found Not to Be Significant" of the PDA EIR provides a brief analysis of each of the focused out topics, and as demonstrated below, the proposed project would be consistent with the applicable impact conclusions.

- **Aesthetics**: The PDA EIR concluded that buildout of the PDA Plan would not cause significant aesthetic impacts. There are no scenic vistas in the Plan area and development within the Plan area provides for infill development within an existing urban built environment, which would not substantially alter the quality of existing scenic views from the Plan area. The PDA EIR concluded that redevelopment within the Plan area would comply with the City's design guidelines, design guidelines contained in the proposed plan, and the City's review processes. Light and glare associated with development in the PDA Plan area would be installed in conformance with the City's lighting and glare performance standards, as set forth in Section 17.12.050 of the Municipal Code.

  The PDA EIR noted that the Station Center subarea, with its conversion of the State Farm campus, would undergo the most visual change in the Plan Area. The EIR assumed that townhouses and mixed-use lofts in the Station Center subarea would be two to three stories high and apartments and condominiums over podium parking would be five- and six-stories in height. The EIR assumed that maximum building heights would be 65 feet and concluded that changes to existing views of the site would be most perceptible from the surrounding Central Commercial, City Center, and Creekside Neighborhood subareas. The proposed project includes building components (primarily building appurtenances such as signage that could reach up to 85 feet within the Mixed Use area. The Rohnert Park Municipal Code (Section 17.10.020 Development Standards) permits towers, spires, cupolas, chimneys, elevator penthouses, water tanks, monuments, and similar structures and necessary mechanical appurtenances covering not more than twenty percent of the top floor roof area to exceed by eight feet the maximum permitted height in the underlying zoning district by conditional use permit. The total footprint of buildings (hotel, retail/office and parking structure) in the proposed Mixed Use designation is 270,000 square feet. Twenty percent (or the area that would be allowed an additional 8 feet in height with a Conditional Use Permit) of the total building area is approximately 54,000 square feet. The proposed project includes approximately 4,000 square feet (less than 2 percent) of the proposed buildings between 65 feet and 73 feet and approximately 2,100 square (approximately 1 percent) feet of the proposed buildings above 73 feet to 85 feet.

  The PDA EIR concluded that visual impacts associated with the redevelopment of the Station Center subarea would be lessened by the open space included along the southern and eastern edges of the subarea and in the northwest corner to preserve the redwood trees on-site. In addition, the EIR concluded that proposed developments would not exceed the height of existing features, such as trees, on the State Farm campus. The EIR assumed that open space

would be included in redevelopment of the Station Center subarea and landscaping would include native trees planted along major roadways to enhance the existing corridors. Trees and other vertical landscape elements also could be used as background plants at community gateway entrances or could be planted along roadway medians. The proposed project includes 1.1 acres dedicated to parks and open space throughout the site and extensive landscaping is proposed. The proposed plan includes detailed design standards and would comply with the Plan area design guidelines and the City's review processes.

Therefore, the proposed project would not differ substantially from the area's existing visual character or alter its existing scenic quality. Consistent with the PDA EIR, the proposed project would have less-than-significant aesthetic impacts.

- **Agriculture and Forestry Resources**: The site supports two buildings, surface parking lots and on-site driveways, and an undeveloped area of grass and mature trees. There are no agricultural or forestry resources on the project site. Consistent with the conclusions in the PDA EIR, implementation of the proposed project as well as the overall PDA Plan would result in no impacts to agricultural or forestry resources.

- **Land Use and Planning**: The PDA EIR concluded that the PDA Plan would not conflict with any applicable land use plans, policies, or regulations and impacts to land use and planning would be less than significant. The proposed project is within the Station Center subarea of the PDA and the proposed project is consistent with the anticipated use of the site in the PDA Plan and would implement the community's vision for a compact, walkable downtown area. While the number of dwelling units and commercial square footages are higher, the proposal is generally consistent with the land uses in the PDA Plan. As discussed below under Population and Housing, the overall PDA Plan has sufficient land use capacity to accommodate the additional units and commercial area. Accordingly, land use impacts associated with the proposed project would be less than significant and consistent with the PDA EIR.

- **Mineral Resources**: According to the PDA EIR, the Plan area is not designated as a locally important mineral resource recovery site; and does not have an operating mine, sampling area, or available known mineral resource that would be of value to the region and the residents of the state. No impacts associated with mineral resources would result from implementation of the PDA Plan, which includes development at the proposed project site.

- **Population and Housing:** As discussed in the PDA EIR, the amount of new development projected under the PDA Plan would not exceed the most recent projections made by the Association of Bay Area Governments (ABAG) or other planning efforts for population or housing in the City. Implementation of the PDA Plan would add up to 835 new residential units and 822,324 square feet of nonresidential development in the Plan area. The PDA EIR assumed that the Station Center area of the PDA could potentially be developed with up to 415 of the 835 total new residential units anticipated with buildout of the Plan area. The project is proposing to construct 460 units total. Thus, with implementation of the proposed project, there would be 45 more units than planned for in the PDA for the Station Center subarea. However, the overall PDA Plan area has sufficient lands use to accommodate the additional units. For instance, in the Creekside Neighborhood subarea of the PDA, the Plan assumed development of 155 high density residential units. However, the actual development occurring in that subarea today will result in 90 units total, 65 units less than was assumed for the subarea in the PDA Plan and EIR. No additional residential development is expected to occur in the Creekside Neighborhood

subarea. Thus, the 45 additional units proposed within the adjacent Station Center subarea can be offset by the deficit in total units in the Creekside Neighborhood subarea. The total number of combined units within these two subareas would be less than was assumed in the PDA EIR. The additional units would not result in a greater residential population within the PDA than was assumed in the PDA EIR.

No housing units would be demolished under the Plan or the proposed project; thus, no replacement housing units would be needed. Implementation of the Plan, including the proposed project, would not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere. Therefore, the impact on population and housing from development of the proposed project would be less than significant, consistent with the conclusion in the PDA EIR.

- **Public Services:** The PDA EIR concluded that build-out of the PDA would represent an increase of approximately 40 percent in the total existing residential population of the PDA Plan area, and an increase of approximately 30 percent over the nonresidential development currently existing in the Plan area. The proposed project site is within the PDA and would result in construction of residences assumed in the PDA Plan. Accordingly, the following conclusions from the PDA EIR regarding to impacts to public services would be applicable to the proposed project:

  Fire and Police Protection Services: This PDA EIR concluded that because City Department of Public Safety complies with National Fire Protection standards in response times and due to the location of two fire stations in the vicinity of the PDA plan area, travel time within the plan area would be meet response time goals. All new project construction would be required to comply with Building and Fire Codes. The City Police Division headquarters is located at 500 City Center Drive immediately north of the proposed project. Further new development within the City limits is required to contribute to the cost of public safety service needs to ensure adequate services. The PDA EIR concluded that impacts of projects within the PDA plan area associated with provision of fire and police protection would be less than significant.

  Schools: The project would be required to pay school impact fees. As concluded in the PDA EIR, payment of these fees would ensure that impacts associated with the increased demand for school services as a result of the project, along with implementation of the overall PDA Plan, would be less than significant.

  Parks: The project would include 1.1 acres designated for parks and open space throughout the site. This use would include a 0.5 of an acre neighborhood park with a children's playground and dog park and a 0.5 of an acre gathering area with seating options. As previously discussed, the project would result in greater total residential units than the 415 units assumed for the Station Center subarea in the PDA EIR. However, as stipulated in the PDA Plan Policy CS-1.1, new development within the PDA would be conditioned to provide park and open space facilities, in accordance with parkland requirements in the City's General Plan, or provide an in-lieu fee to support development of new park and open space facilities. Thus, upon dedication of the proposed park and payment of an in-lieu fee, impacts associated with the proposed project would be less than significant, consistent with the PDA EIR.

Libraries: The PDA EIR concluded that impacts to the Rohnert Park–Cotati Library would be less than significant because the Library has the available capacity to serve new residents projected to live within the Plan area at build-out of the PDA. Because the proposed project would not result in a greater total residential population than assumed in the PDA EIR, impacts to libraries would be less than significant, consistent with the PDA EIR

- **Recreation**: The PDA EIR concluded that recreation impacts of implementing the PDA Plan would be less than significant. The proposed project site would accommodate a portion of the new residents expected to reside in the Plan area upon buildout of the PDA. The proposed project would not result in impacts outside of what was assessed in the PDA EIR in relation to an increased use of area parks or recreational facilities. Effects associated with the construction of the proposed project are evaluated under the individual resource topics in this consistency analysis.

- **Utilities and Service Systems**: The proposed project site is within the PDA and would result in construction of a portion of the planned new residences assumed in the PDA Plan. Accordingly, the following conclusions from the PDA EIR regarding utility and service system impacts would be applicable to the proposed project:

  Wastewater: The PDA EIR concluded that the PDA Plan area can be accommodated by the City's existing approved and planned wastewater capacity and would not result in the need for any new off-site wastewater system expansions that are not already documented in the approved Incremental Recycled Water System Program EIR. A hydraulic evaluation was prepared by the City's consultant, GHD, to evaluate and compare the existing and proposed sanitary sewer collection system downstream of the proposed project. The City's study determined the need for additional capacity, including the planned need to upsize the sewer mains in Enterprise Drive and Hunter Drive to serve the project. The sewer improvements are subject to the proposed development agreement between the City and developer, and would be performed as a separate project at a later date. The improvements would be completed as part of a separate City project and prior to occupancy of the development. Accordingly, impacts of implementing the PDA Plan would be less than significant.

  Water Supply: The PDA EIR concluded that the projected demand for the PDA Plan area is significantly less than the City's available water supplies. The City's existing water supply sources and facilities are expected to be sufficient to provide an adequate supply of water to meet the Plan area's current and future demands. Impacts related to water supply and infrastructure would be less than significant.

  Stormwater: As noted in the PDA EIR, because the existing stormwater system provides adequate protection to the PDA Plan area and because existing design requirements and Plan policies would minimize any increases in stormwater runoff or changes in stormwater quality, the stormwater-related impacts would be less than significant.

  Solid Waste: According to the analysis in the PDA EIR, the impact of the PDA Plan related to an increase in demand for solid waste collection and disposal in the city would be less than significant. The Plan area would not contain features that would generate waste flows at rates that would exceed typical disposal rates for the City and impacts would be less than significant.

Electricity and Natural Gas: The PDA EIR concluded that the demand for electricity and natural gas attributable to the PDA Plan would not exceed the capacity of existing or planned service systems and impacts related to electricity and natural gas consumption would be less than significant. The PDA EIR concluded that implementation of the PDA Plan would not encourage or result in activities that consume large amounts of fuel, water, or energy in an inefficient manner nor would the Plan conflict with any applicable plans, policies, or regulations adopted for the purpose of reducing energy use, particularly nonrenewable energy use. Impacts would be less than significant.

III. Consistency Determination

As demonstrated in the analysis included in Section II of this document, the proposed Station Avenue Project is consistent with the PDA Plan analyzed in the PDA EIR. Impacts associated with the project are consistent with those previously identified and analyzed in the PDA EIR and implementation of applicable mitigation measures, as identified throughout this consistency analysis, would ensure that all project-related impacts remain less than significant, consistent with the PDA EIR. Impacts that were significant and unavoidable in the PDA EIR remain significant and unavoidable and were considered prior to adoption of the PDA Plan. To ensure the effective implementation and enforcement of applicable PDA EIR mitigation measures, the project would be required to adhere to the MMRP for the PDA EIR.

Conclusion:

- The proposed project would not result in impacts on the environment that were not identified as impacts in the PDA EIR;
- The proposed project would not result in potentially significant impacts that were not identified in the PDA EIR;
- The proposed project would not result in significant impacts, which, as a result of substantial new information that was not known at the time the PDA EIR was certified, would be more severe than were already analyzed and disclosed in the PDA EIR; and
- The project sponsor would undertake the appropriate mitigation measures specified in the PDA EIR to mitigate project-related significant impacts, which are described in the MMRP in Appendix H.
- There are no new mitigation measures or alternatives which are considerably different from those analyzed in the PDA EIR that would substantially reduce one or more significant impacts.

IV. References

City of Rohnert Park 2016. Central Rohnert Park Priority Area Development Plan. Adopted March 2016.

City of Rohnert Park 2015. Central Rohnert Park Priority Development Area Plan Final Environmental Impact Report (SCH # 2015102081).

Dudek 2018a. *Station Avenue Project Air Quality and Greenhouse Gas Emissions Assessment*. September 27, 2018.

Dudek 2018b. *Biological Constraints Report for the Proposed Rohnert Station (Station Avenue) Project Site in Rohnert Park, Sonoma County, California*. July 20, 2018.

Dudek 2018c. *Review of Potential Wetlands and Waters of the United States for the Proposed Rohnert Station Project Site in Rohnert Park, Sonoma County, California*. July 17, 2018.

Dudek 2018d. *Noise Analysis for Rohnert Station (Station Avenue) Project*. September 25, 2018.

GHD 2018. Rohnert Station Development Sewer Hydraulic Evaluation. May 18, 2018.

Laulima Development LLC 2018. *Station Avenue Final Development Plan*. September 11, 2018.

Miller Pacific Engineering Group. 2018. Preliminary *Geotechnical Investigation Rohnert Station Mixed-Use Development 6400 State Farm Drive Rohnert Park, California*. June 19, 2018.

Monarch Consulting Arborists 2018. *Rohnert Station Arborist Site's Overview*. June 19, 2018.

Partner Engineering and Science, Inc. 2017. *Phase I Environmental Site Assessment Report*. September, 2017.

WRA Environmental Consultants 2014. *Tree Survey Report North Bay Community Rohnert Park, California*. June 26, 2014.

W-Trans 2018. *Traffic Impact Study for Station Avenue*. September 28, 2018.

Appendices A-H

Available for viewing and printing:

City Hall, 2nd Floor

130 Avram Avenue

(Flashdrive is also available)